

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

DR. GEORGE RICHARDSON, ROSALIE	§	
WEISFELD, AUSTIN JUSTICE	§	
COALITION, COALITION OF TEXANS	§	
WITH DISABILITIES, MOVE TEXAS	§	
CIVIC FUND, LEAGUE OF WOMEN	§	
VOTERS OF TEXAS, and AMERICAN GI	§	
FORUM OF TEXAS, INC.,	§	
	§	
<i>Plaintiffs</i>	§	
	§	
v.	§	Civil Case No. 5:19-cv-00963-OG
	§	
TEXAS SECRETARY OF STATE, TRUDY	§	
HANCOCK, in her official capacity as	§	
BRAZOS COUNTY ELECTIONS	§	
ADMINISTRATOR, and PERLA LARA in	§	
her official capacity as CITY OF	§	
MCALLEN, TEXAS SECRETARY,	§	
	§	
<i>Defendants.</i>	§	

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Dated: July 6, 2020

Respectfully submitted,

/s/ Hani Mirza

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**CERTIFICATE OF SERVICE**

By my signature below, I certify that a true and correct copy of the foregoing has been served on all counsel of record on July 6, 2020 through the Electronic Case File System of the Western District of Texas.

/s/ Hani Mirza

# Exhibit 70

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

---oOo---

DR. GEORGE RICHARDSON, ROSALIE	)	
WEISFELD, AUSTIN JUSTICE	)	
COALITION, COALITION OF TEXANS	)	
WITH DISABILITIES, MOVE TEXAS	)	
CIVIC FUND, LEAGUE OF WOMEN	)	
VOTERS OF TEXAS, AND AMERICAN	)	
GI FORUM OF TEXAS, INC.,	)	
	)	
Plaintiffs,	)	
vs.	)	No. 5:19-cv-00963
	)	
TEXAS SECRETARY OF STATE,	)	
TRUDY HANCOCK, IN HER OFFICIAL	)	
CAPACITY AS BRAZOS COUNTY	)	
ELECTIONS ADMINISTRATOR AND	)	
PERLA LARA IN HER OFFICIAL	)	
CAPACITY AS CITY OF MCALLEN,	)	
TEXAS SECRETARY,	)	
	)	
Defendants.	)	
_____	)	

Remote Videotaped Oral Deposition of

LINTON A. MOHAMMED, PhD

30(b)(6)

Monday, May 4th, 2020

Reported by:  
KIMBERLEE SCHROEDER, CSR, RPR, CCRR  
TX CSR 10925 - CA CSR 11414

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(All Appearances Via Remote Videoconference)

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Also Present:

AMELIA CHRISTOPHER, Videographer

## I N D E X

## DEPOSITION OF LINTON A. MOHAMMED, PhD

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---oOo---



1 BE IT REMEMBERED that on Monday, May 4, 2020,  
2 commencing at the hour of 11:17 a.m., via remote  
3 videoconferencing, before me, KIMBERLEE SCHROEDER, a  
4 Certified Shorthand Reporter in and for the State of  
5 Texas and the State of California, duly authorized to  
6 administer oaths pursuant to Section 30(c) of the  
7 Federal Rules of Civil Procedure and the Texas Rules of  
8 Civil Procedure, personally appeared.

9 LINTON A. MOHAMMED, PhD,  
10 called as a witness herein by the Defendants, who,  
11 having been duly sworn, was thereupon examined as  
12 hereinafter set forth.  
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1 of everything that went into the pot when you prepared  
2 your report. So if there is any other information about  
3 the plaintiffs that we haven't already talked about that  
4 you considered.

5 A. No. The only thing I had asked plaintiffs'  
6 counsel was whether Dr. Richardson was a medical doctor.

7 **Q. And why did you want to know that?**

8 A. When I looked at both signatures, the first  
9 signature, I guess on the mail-in ballot or the  
10 application, was a very quickly written, what I call a  
11 mixed-style signature.

12 The second signature on the ballot itself was  
13 a more, what I call a more readable text-based styled  
14 signature. So I inquired if Dr. Richardson was a  
15 medical doctor because the first signature would have  
16 been more what I'm used to seeing from medical doctors  
17 on prescriptions: a very hastily written, scribbled  
18 signature. Whereas, the second signature was more --  
19 was a signature of what I would term better quality.

20 **Q. And why was that relevant?**

21 A. Because it would give an explanation as to why  
22 Dr. Richardson had two different signature styles. One  
23 was his, what I would call his prescription-style  
24 signature. And the other one was a more formal  
25 signature.

1           **Q. In your expert opinion as a forensic document**  
2 **examiner, were the two signatures made by Dr. Richardson**  
3 **a match?**

4           A. No. I would say they were pictorially  
5 dissimilar.

6           **Q. Okay.**

7           MR. MIRZA: I just want to note for the record  
8 I put in an objection.

9           Mr. Mohammed, just wait a couple of seconds so  
10 I can add my objections in.

11           THE WITNESS: Okay. Sure.

12           MS. MACKIN: Q. On your report, Dr. Mohammed,  
13 it mentions that you reviewed the plaintiffs' complaint  
14 in this case; correct?

15           A. Yeah.

16           **Q. Have you reviewed any other pleadings in this**  
17 **case?**

18           A. No.

19           **Q. What is your understanding -- and I'm not**  
20 **asking for a legal conclusion. I know you're not here**  
21 **to offer that. But what is your understanding of the**  
22 **complaints that the plaintiffs are making in this case?**

23           A. That they -- they signed -- they signed the  
24 mail-in ballot application, and they signed the ballots,  
25 and the signatures on the ballots were rejected, and

1 **rejections."**

2 **What did you mean by the phrase "different**  
3 **signature styles and features"?**

4 A. Okay. So signatures can be classified into  
5 three types. First one is called a text-based signature  
6 where you can look at the signature and know the  
7 person's name, and in Dr. Richardson's example which is  
8 in front of us, the second signature on the ballot would  
9 be a text-based signature. You can look at that  
10 signature and read the name "George A." -- excuse me --  
11 "George A. Richardson."

12 The top signature, or the first signature on  
13 the application, is what I would call a mixed-style  
14 signature. There's a second classification where you  
15 can look at the signature, and you can read about two or  
16 three legible features in the signature, and the rest  
17 you can't see what it means.

18 And then the third type is called a stylized  
19 signature, which can read anything, any characters in  
20 the signature. That is basically a pattern. For  
21 example, you find that people who write stylized  
22 signatures have more variations in their signatures than  
23 people who write text-based signatures.

24 So someone looking at signatures who is  
25 unaware of this may not be able to assess the variation

1 in the stylized signatures as much as they should.

2 **Q. Is it more difficult to compare signatures of**  
3 **different styles than it is to compare signatures of the**  
4 **same style?**

5 A. You basically cannot -- cannot compare  
6 signatures of different styles. It has to be like with  
7 like, apples with apples, oranges with oranges. So  
8 that's why with Dr. Richardson's case where the first  
9 signature was a mixed-style, the second signature was a  
10 text-based style, there's not much to compare with those  
11 signatures.

12 **Q. Then moving to paragraph 33, so there you**  
13 **describe Type I errors, which the report indicates occur**  
14 **when a non-genuine signature is deemed genuine. Type II**  
15 **errors occur when a genuine signature is deemed**  
16 **non-genuine.**

17 **Then you say, "Type II errors are considered**  
18 **more egregious than Type I." By whom?**

19 A. By FDEs because, as an FDE who spent most of  
20 my career in crime labs, if I'm -- let's say a check was  
21 written, and someone said, "Oh, this signature has been  
22 forged," and I opine incorrectly that it's genuine, then  
23 the person gets away with it.

24 If, on the other hand, they bring the  
25 signature and said it is forged and I opine it is

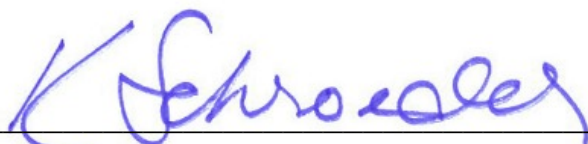
1 STATE OF TEXAS )

2 REPORTER'S CERTIFICATION

3 I, KIMBERLEE SCHROEDER, CSR, RPR, CCRR,  
4 Certified Shorthand Reporter for the State of Texas,  
5 License No. 10925 and the State of California, License  
6 No. 11414, hereby certify that the witness was duly  
7 sworn and that this transcript is a true record of the  
8 testimony given by the witness.

9 I further certify that I am neither counsel  
10 for, related to, nor employed by any of the parties or  
11 attorneys in the action in which this proceeding was  
12 taken. Further, I am not a relative or employee of any  
13 attorney of record in this cause, nor am I financially  
14 or otherwise interested in the outcome of the action.

15 Subscribed and sworn to by me this day, the  
16 21st day of May, 2020.

17  
18  
19  
20  
21   
22 KIMBERLEE SCHROEDER, CSR, RPR, CCRR  
23 TX CSR No. 10925 - CA CSR No. 11414  
24  
25

# Exhibit 71

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

DR. GEORGE RICHARDSON, \*  
ROSALIE WEISFELD, AUSTIN \*  
JUSTICE COALITION, \*  
COALITION OF TEXANS WITH \*  
DISABILITIES, MOVE TEXAS \*  
CIVIC FUND, LEAGUE OF \*  
WOMEN VOTERS OF TEXAS, \*  
and AMERICAN GI FORUM OF \*  
TEXAS, INC., \*

Plaintiffs, \*

VS. \*

CIVIL ACTION NUMBER  
5:19-cv-0963

TEXAS SECRETARY OF \*  
STATE, TRUDY HANCOCK, IN \*  
HER OFFICIAL CAPACITY AS \*  
BRAZOS COUNTY ELECTIONS \*  
ADMINISTRATOR, AND PERLA \*  
LARA IN HER OFFICIAL \*  
CAPACITY AS CITY OF \*  
McALLEN, TEXAS \*  
SECRETARY, \*

Defendants. \*

Remote Oral Deposition of  
Austin Justice Coalition,

By and through their Designated Representative,

LARISSA RODIONOV

May 20, 2020

10:16 a.m.

Reported by:

Micheal A. Johnson, RDR, CRR



1           REMOTE ORAL DEPOSITION OF AUSTIN JUSTICE  
2 COALITION, BY AND THROUGH THEIR DESIGNATED  
3 REPRESENTATIVE, LARISSA RODIONOV, produced at the  
4 instance of the Defendant, Texas Secretary of State,  
5 in the above-styled and numbered cause on the  
6 20th day of May, 2020, at 10:16 a.m., before Micheal  
7 A. Johnson, RDR, CRR, Notary Public in and for the  
8 State of Texas, reported by realtime stenographic  
9 means, at the location of the witness, Austin,  
10 Texas, pursuant to Notice of Oral Deposition, and in  
11 accordance with the Federal Rules of Civil  
12 Procedure.

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25

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## 1 REMOTE APPEARANCES (CONT.)

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## 26 ALSO PRESENT:

27 Amelia Christopher, Video Technician

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LARISSA RODIONOV  
May 20, 2020

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DEPOSITION EXHIBITS  
LARISSA RODIONOV  
May 20, 2020

NUMBER	DESCRIPTION	MARKED
Exhibit 1	Defendant Secretary of State's Notice of Oral Deposition Pursuant to Federal Rule of Civil Procedure 30	11
Exhibit 2	Plaintiffs' Original Complaint	22
Exhibit 3	Fiscal Sponsorship Agreement AJC-00000029 - AJC-00000031	31
Exhibit 4	Austin Justice Coalition PowerPoint Presentation AJC-00000017 - AJC-00000028	36
Exhibit 5	Excel Spreadsheet, LR052020_EX05	51
Exhibit 6	Excel Spreadsheet, LR052020_EX06	54
Exhibit 7	County Elections Division Instructions and Addresses for Ballot by Mail Application AJC-00000002 - AJC-00000003	61

## PROCEEDINGS

LARISSA RODIONOV,

called as a witness, having been duly sworn by a  
Notary Public, was examined and testified as  
follows:

## EXAMINATION

BY MS. MACKIN:

Q. Good morning. May I please have you  
speak and spell your name for the record.

A. Larissa Rodionov, L-a-r-i-s-s-a  
R-o-d-i-o-n-o-v.

Q. And I'm sorry, will you pronounce your  
last name again since I'm going to be using it  
throughout this deposition and I don't want to mess  
it up?

A. Okay. Rodionov.

Q. Rodionov. Okay.

A. You're welcome to use my first name if  
that's better.

Q. I appreciate that. Thank you.

Good morning. My name is Anna Mackin. I  
am an attorney and I represent the Secretary of  
State in this lawsuit. I'm going to be asking you  
some questions today. Have you ever been deposed  
before?

## EXAMINATION

BY MR. TAWIL:

Q. Good afternoon, ma'am. I do not want to mispronounce your name, with a last name like Tawil, I'm sensitive to mispronunciation, so how do you say your last name again?

A. Rodionov.

Q. Rodionov. Okay. Ms. Rodionov, I appreciate you taking the time to testify for us today. I have just a short list of questions I'd like to go over with you. Does the Austin -- what's the official name of your organization, the Austin Justice Coalition?

A. Yes.

Q. Do you have any members from McAllen, Texas?

A. Not that I'm aware of.

MR. KALAR: Objection to form.

But go ahead.

BY MR. TAWIL:

Q. Do you know if the Austin Justice Coalition has ever engaged any voter or potential voter in McAllen, Texas?

MR. KALAR: Objection to form.

But go ahead.

1           A.       I can't say for certain either way. We  
2 do not keep -- so the jail population can include  
3 people from all over Texas. We don't have records  
4 of where all the people we've registered voters, we  
5 don't keep records of where they are all from or the  
6 same thing with the ballot by mail population, so  
7 it's possible, but I can't say for sure.

8 BY MR. TAWIL:

9           Q.       Do you know if you ever -- if the Austin  
10 Justice Coalition ever assisted a voter to register  
11 to vote in a McAllen election?

12                   MR. KALAR: Object to form.

13 BY MR. TAWIL:

14           Q.       Let me limit that in time. Since 2017?

15                   MR. KALAR: Same objection.

16           A.       In McAllen, specifically for a McAllen  
17 city election?

18 BY MR. TAWIL:

19           Q.       Any election in McAllen.

20           A.       Again, I can't say for certain. I don't  
21 know where all the people have come from.

22           Q.       Has anybody that voted by mail in an  
23 election in McAllen ever reached out to the Austin  
24 Justice Coalition for assistance as a result of any  
25 issue related to the ballot by mail that they cast?



1 THE WITNESS: Thanks.

2 EXAMINATION

3 BY MR. MAGEE:

4 Q. Hi, my name is Eric Magee and I'm the  
5 attorney that represents Brazos County elections  
6 administrator Trudy Hancock in her official  
7 capacity, and my questions are similar to  
8 Mr. Tawil's. Has the Austin Justice Coalition ever  
9 done any work in Brazos County?

10 MR. KALAR: Objection to form.

11 A. We have not gone to Brazos County and  
12 done any work in Brazos County, no.

13 BY MR. MAGEE:

14 Q. So you have not visited any of the Brazos  
15 County detention centers, correct?

16 A. Correct.

17 Q. Have you had any communications since  
18 2016 with the Brazos County elections office?

19 A. No.

20 Q. And do you know, have you ever assisted a  
21 registered voter in Brazos County in obtaining a  
22 mail-in ballot application?

23 MR. KALAR: Objection to form.

24 A. Again, I can't say for certain yes or no.  
25 We help anybody registering, no matter where they

1 lived in Texas and we don't keep good records of  
2 where all of those people are from.

3 MR. MAGEE: I think I have no further  
4 questions.

5 MR. KALAR: No questions from me. We  
6 will reserve and pass the witness.

7 MS. MACKIN: All right. I think  
8 we're finished.

9 THE REPORTER: Transcript orders,  
10 please.

11 MR. KALAR: I'll put that on the  
12 record.

13 MR. TAWIL: Sorry, Samuel. City  
14 of -- Perla Lara would like E-Tran, please.

15 MR. MAGEE: An E-Tran is fine with us  
16 as well, Brazos County.

17 THE REPORTER: Samuel, I did not get  
18 what you said.

19 MR. KALAR: Again, we would like  
20 to -- we would like to read and sign, and sending  
21 that to TCRP would be great.

22 THE REPORTER: Anyone else? We're  
23 off the record.

24 (Deposition concluded at 12:26 p.m.)  
25

## REPORTER'S CERTIFICATION

I, Micheal A. Johnson, Registered Diplomate Reporter, Certified Realtime Reporter and Notary Public in and for the State of Texas, certify that on the 20th day of May, 2020, I reported the Remote Oral Deposition of LARISSA RODIONOV, after the witness had first been duly cautioned and sworn to testify under oath; said deposition was subsequently transcribed by me and under my supervision and contains a full, true and complete transcription of the proceedings had at said time and place; and that reading and signing was requested.

I further certify that I am neither counsel for nor related to any party in this cause and am not financially interested in its outcome.

GIVEN UNDER MY HAND AND SEAL of office on this 29th day of May, 2020.

---

MICHEAL A. JOHNSON, RDR, CRR  
NCRA Registered Diplomate Reporter  
NCRA Certified Realtime Reporter

Notary Public in and for the  
State of Texas  
My Commission Expires: 8/8/2020

# Exhibit 72

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

DR. GEORGE RICHARDSON, \*  
ROSALIE WEISFELD, AUSTIN \*  
JUSTICE COALITION, \*  
COALITION OF TEXANS WITH \*  
DISABILITIES, MOVE TEXAS \*  
CIVIC FUND, LEAGUE OF \*  
WOMEN VOTERS OF TEXAS, \*  
and AMERICAN GI FORUM OF \*  
TEXAS, INC., \*

Plaintiffs, \*

VS. \*

CIVIL ACTION NUMBER  
5:19-cv-0963

TEXAS SECRETARY OF \*  
STATE, TRUDY HANCOCK, IN \*  
HER OFFICIAL CAPACITY AS \*  
BRAZOS COUNTY ELECTIONS \*  
ADMINISTRATOR, AND PERLA \*  
LARA IN HER OFFICIAL \*  
CAPACITY AS CITY OF \*  
McALLEN, TEXAS \*  
SECRETARY, \*

Defendants. \*

Remote Oral Deposition of

League of Women Voters of Texas,

By and through their Designated Representative,

GRACE CHIMENE

May 18, 2020

10:08 a.m.

Reported by:

Micheal A. Johnson, RDR, CRR

1           REMOTE ORAL DEPOSITION OF LEAGUE OF WOMEN  
2 VOTERS OF TEXAS, BY AND THROUGH THEIR DESIGNATED  
3 REPRESENTATIVE, GRACE CHIMENE, produced at the  
4 instance of the Defendant, Texas Secretary of State,  
5 in the above-styled and numbered cause on the  
6 18th day of May, 2020, at 10:08 a.m., before Micheal  
7 A. Johnson, RDR, CRR, Notary Public in and for the  
8 State of Texas, reported by realtime stenographic  
9 means, at the location of the witness, Austin,  
10 Texas, pursuant to Notice of Oral Deposition, and in  
11 accordance with the Federal Rules of Civil  
12 Procedure.

13

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ALSO PRESENT:

Brian Christopher, Video Technician



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GRACE CHIMENE  
May 18, 2020

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DEPOSITION EXHIBITS  
GRACE CHIMENE  
May 18, 2020

NUMBER	DESCRIPTION	MARKED
Exhibit 1	Defendant Secretary of State's First Amended Notice of Oral Deposition Pursuant to Federal Rule of Civil Procedure 30	11
Exhibit 2	Plaintiffs' Original Complaint	20
Exhibit 3	League of Women Voters of Texas Education Fund (TEF) Proposed Budget for 2016-2018 LWV-00000575	37
Exhibit 4	Explanation of Proposed Budgets for 2016-2018 Excerpts from 2016 Convention Workbook LWV-00000020 - LWV-00000022	47
Exhibit 5	Explanation of Proposed Budgets LWV-00000068 - LWV-00000069	65
Exhibit 6	Explanation of Proposed Budgets LWV-00000240 - LWV-00000241	66
Exhibit 7	Explanation of Proposed Budget for 2020-2022 LWV-00000151 - LWV-00000153	68

DEPOSITION EXHIBITS  
GRACE CHIMENE  
May 18, 2020

NUMBER	DESCRIPTION	MARKED
Exhibit 8	PowerPoint, LWV, Empowering voters Defending democracy, Get in the Game LWV-00000272 - LWV-00000295	71
Exhibit 9	PowerPoint, LWV Empowering voters Defending democracy, Vote by Mail LWV-00000344 - LWV-00000367	71
Exhibit 10	Excel Spreadsheet LWV-00000701	82
Exhibit 12	Facebook Screenshot LWV-00000702	110
Exhibit 13	Facebook Screenshot LWV-00000703	113

PROCEEDINGS

GRACE CHIMENE,

called as a witness, having been duly sworn by a  
Notary Public, was examined and testified as  
follows:

EXAMINATION

BY MS. MACKIN:

Q. Good morning, my name is Anna Mackin.  
I'm an attorney with the Texas Office of the  
Attorney General and I represent the defendant, the  
Texas Secretary of State, in this lawsuit. I'm  
going to be taking your deposition today.

Would you please speak and spell your  
name for the record.

A. Grace Chimene, G-r-a-c-e C-h-i-m-e-n-e.

Q. And, Ms. Chimene, I understand that you  
have been deposed before; is that correct?

A. Yes.

Q. How many times?

A. Once.

Q. And was it also a virtual deposition,  
just like this one today?

A. Yes, it was. Yes. But I had an office  
and now I don't have an office.

Q. Well, thank you for your time today.

1 Q. And who developed it?

2 A. The LWVUS.

3 Q. Okay. So you mentioned that the mission  
4 statement changed. Would you say that the  
5 mission -- the actual mission of the League of Women  
6 Voters of Texas has changed over time?

7 A. No, I don't think so. Not since I've  
8 been in it.

9 Q. And this actually pivots nicely into the  
10 next thing I want to talk about. You mentioned  
11 League of Women Voters US.

12 A. Uh-huh.

13 Q. What is that?

14 A. The League of Women Voters is a  
15 three-tiered organization. When you join the League  
16 of Women Voters as a member, you normally join as  
17 a -- into your local league, so the league that  
18 serves your community, because that's where your  
19 local activities are done. When you join your local  
20 league, you also are joining as a member of the  
21 state league and the US league. So we're all one  
22 organization. We speak with one voice and it is --  
23 but it is serving -- the local leagues serve the  
24 populations of the community, the state league  
25 serves the whole state and the US league serves all

1 the US.

2 Q. And can you explain to me a little bit  
3 more -- I know this might not be a great question.  
4 I'm just -- so I'm sorry. Let me know if it doesn't  
5 make sense -- but a little bit more about the  
6 relationship between the US league, the state  
7 leagues and the local leagues.

8 A. The relationship? So we're all members  
9 of the same organization. All our membership data  
10 is kept up at the LWVUS. So when you join, you  
11 join -- you pay the money to join. It's a  
12 membership organization. You pay the money to join.  
13 Some of the money stays at the local level, some of  
14 the money goes to the state level and some of the  
15 money goes to the US level.

16 Q. That's helpful.

17 A. The positions -- yeah, okay. The  
18 positions are -- at the national level, we support  
19 everything they do. We support that at the state  
20 level and also at the local level. So we are a  
21 membership organization. We don't do something that  
22 is not supported by one of our positions at the US  
23 level, state or local level. Does that make sense?

24 Q. And so would there maybe be some  
25 circumstances in which a state league or a local

1 league has a specific position that the national  
2 league doesn't -- I'm not saying like something  
3 contradictory, I mean something like more specific.

4 A. Right. And so they would, because a  
5 local level league -- a local league is serving  
6 their community. So they may have -- take specific  
7 issues in regard to traffic or in regard to access  
8 to playgrounds, access to parks. They may take --  
9 you know, just things that have to do with the local  
10 level. So in the Houston area, it might be having  
11 to do with the flooding that's going on. Although  
12 they may be using a state position, they may change  
13 it a little bit -- they still support it, but to  
14 make -- to help more at the local level, to be more  
15 specific about what they support at the local level.

16 Q. And I want to understand a little bit  
17 more about how funds move between the different  
18 levels, to the extent that they do. I think you  
19 mentioned that the -- that members pay dues and some  
20 of it goes to local, some of it goes to state, some  
21 of it goes to US; is that right?

22 A. Yes. They call it a per-member payment,  
23 and you'll see that in some of the documents. And a  
24 per-member payment is what you pay when you join.  
25 It's not really dues. It's really something else, a

1 membership payment. And that those per-member  
2 payments, some stays at the local level, some at the  
3 state level and the US level. And any money that  
4 comes in on top of that, the local leagues can keep.  
5 So oftentimes people will make donations to their  
6 local league to help pay for the Voters Guide or  
7 some other activity that's going on and that would  
8 be on top of the per-member payment.

9 Q. And the League of Women Voters of Texas  
10 currently -- we're going to get a little bit more  
11 into the weeds of this later on -- but currently is  
12 a 501(c)(3) organization; is that right?

13 A. The League of Women Voters of Texas is  
14 now a 501(c)(3).

15 Q. And do you know the tax status of the  
16 national League of Women Voters, whether it's a  
17 501(c)(3)?

18 A. They have -- there is a 501(c)(3) called  
19 LWVUS Education Fund and there's a 501(c)(4), which  
20 is probably -- but I'm not the president of the  
21 LWVUS.

22 Q. Fair enough.

23 A. But I think -- that's my understanding.

24 Q. You're not testifying on behalf of the  
25 LWVUS, so I --



1 local league, right, in Texas that you have?

2 A. Yes.

3 Q. And the number of members?

4 A. Right.

5 Q. And then you account for anybody that's  
6 not a member of one of the local leagues, down here  
7 at the bottom where it says, individual state  
8 members?

9 A. Yes.

10 Q. And it identifies 34?

11 A. Yes.

12 Q. So of those 34, you believe there are  
13 members from Brazos County in that 34 total?

14 A. Yes.

15 Q. Okay. How many; do you know?

16 A. When you're -- we sent in the  
17 information, I believe it was three, but I would  
18 have to look.

19 Q. Okay. Then I wanted to go to Exhibit 5,  
20 which is LW3 --

21 A. Wait a second.

22 Q. Exhibit 7, which is LW344.

23 A. 344. Yes. Just a second. Yes.

24 Q. Let me get over here to the right page.  
25 I'm sorry, let me just tell you a different one.

1 one last question I wanted to ask you is, so we  
2 talked a bit about the structure of the League of  
3 Women Voters of Texas and the local leagues. Is  
4 there a local league for all of the 254 counties in  
5 Texas?

6 A. No, there is not. What we do is -- so  
7 any community that doesn't have a local league, the  
8 League of Women Voters of Texas provides them the  
9 service the best we can. We provide Voter Guides,  
10 we provide voter education and we do the county  
11 election website survey and provide election  
12 administrators with information to help them provide  
13 best -- use best practices to provide voters with  
14 information.

15 Q. Great. That makes sense. So if a member  
16 doesn't have a local league in their county, you  
17 said already -- you testified already that they're  
18 members at large. Is that right, generally?

19 A. They used to be -- in some places they're  
20 called -- in some states they're called members at  
21 large. In Texas, because of the MAL being something  
22 that we don't want to call people, we try to call  
23 them more often, statewide members.

24 Q. Understood.

25 MS. SURIANI: Well, that's all I

REPORTER'S CERTIFICATION

I, Micheal A. Johnson, Registered Diplomat  
Reporter, Certified Realtime Reporter and Notary  
Public in and for the State of Texas, certify that  
on the 18th day of May, 2020, I reported the Remote  
Oral Deposition of GRACE CHIMENE, after the witness  
had first been duly cautioned and sworn to testify  
under oath; said deposition was subsequently  
transcribed by me and under my supervision and  
contains a full, true and complete transcription of  
the proceedings had at said time and place; and that  
reading and signing was requested.

I further certify that I am neither counsel  
for nor related to any party in this cause and am  
not financially interested in its outcome.

GIVEN UNDER MY HAND AND SEAL of office on  
this 29th day of May, 2020.



MICHEAL A. JOHNSON RDR, CRR  
NCRA Registered Diplomat Reporter  
NCRA Certified Realtime Reporter  
Notary Public in and for the  
State of Texas  
My Commission Expires: 8/8/2020

# Exhibit 73

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

DR. GEORGE RICHARDSON, \*  
ROSALIE WEISFELD, AUSTIN \*  
JUSTICE COALITION, \*  
COALITION OF TEXANS WITH \*  
DISABILITIES, MOVE TEXAS \*  
CIVIC FUND, LEAGUE OF \*  
WOMEN VOTERS OF TEXAS, \*  
and AMERICAN GI FORUM OF \*  
TEXAS, INC., \*

Plaintiffs, \*

VS. \*

CIVIL ACTION NUMBER  
5:19-cv-0963

TEXAS SECRETARY OF \*  
STATE, TRUDY HANCOCK, IN \*  
HER OFFICIAL CAPACITY AS \*  
BRAZOS COUNTY ELECTIONS \*  
ADMINISTRATOR, AND PERLA \*  
LARA IN HER OFFICIAL \*  
CAPACITY AS CITY OF \*  
McALLEN, TEXAS \*  
SECRETARY, \*

Defendants. \*

Remote Oral Deposition of

MOVE Texas Civic Fund,

By and through their Designated Representative,

HILLIARD DREW GALLOWAY

May 22, 2020

10:02 a.m.

Reported by:

Micheal A. Johnson, RDR, CRR

1 REMOTE ORAL DEPOSITION OF MOVE TEXAS CIVIC  
2 FUND, BY AND THROUGH THEIR DESIGNATED  
3 REPRESENTATIVE, HILLIARD DREW GALLOWAY, produced at  
4 the instance of the Defendant, Texas Secretary of  
5 State, in the above-styled and numbered cause on the  
6 22nd day of May, 2020, at 10:02 a.m., before Micheal  
7 A. Johnson, RDR, CRR, Notary Public in and for the  
8 State of Texas, reported by realtime stenographic  
9 means, at the location of the witness, Austin,  
10 Texas, pursuant to Notice of Oral Deposition, and in  
11 accordance with the Federal Rules of Civil  
12 Procedure.

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## REMOTE APPEARANCES

## ON BEHALF OF THE PLAINTIFFS:

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## REMOTE APPEARANCES (CONT.)

ON BEHALF OF THE DEFENDANT  
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ON BEHALF OF THE DEFENDANT  
PERLA LARA IN HER OFFICIAL CAPACITY AS CITY OF  
McALLEN, TEXAS SECRETARY:

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## ALSO PRESENT:

Amelia Christopher, Video Technician



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HILLIARD DREW GALLOWAY  
May 22, 2020

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DEPOSITION EXHIBITS  
HILLIARD DREW GALLOWAY  
May 22, 2020

NUMBER	DESCRIPTION	MARKED
Exhibit 1	Defendant Secretary of State's Notice of Oral Deposition Pursuant to Federal Rule of Civil Procedure 30	10
Exhibit 2	Plaintiffs' Original Complaint	19
Exhibit 3	MOE Texas 2020 Budgets MOVE-00000917 - MOVE-00000919	35
Exhibit 4	09/05/2019 through 09/09/2019 E-mail Chain MOVE-00000519 - MOVE-00000522	45
Exhibit 5	07/05/2019 E-mail Chain MOVE-00000004 - MOVE-00000007	50

## PROCEEDINGS

HILLIARD DREW GALLOWAY,

called as a witness, having been duly sworn by a  
Notary Public, was examined and testified as  
follows:

## EXAMINATION

BY MS. MACKIN:

Q. Good morning, Mr. Galloway. If I could  
please have you speak and spell your name for the  
record.

A. Good morning. My name is Hilliard,  
H-i-l-l-i-a-r-d, Drew, D-r-e-w, Galloway,  
G-a-l-l-o-w-a-y.

Q. Thank you. And we had the opportunity to  
cover some ground when I took your deposition for  
another case, so I'm going to try to avoid  
duplicative things, but -- and hopefully get us out  
of here maybe a little earlier on our Friday.

Just a couple of those reminders. We  
will both try not to speak over one another so that  
Mr. Johnson can get an accurate record of everything  
that is said. And obviously, if you need a break at  
any time, just let me know. Okay?

A. Yes. It's good to see you again.

Q. You too. I think -- was it a Friday the

1 what did you communicate to them?

2 A. I shared the deposition notice with them  
3 and instructed them that I would be representing the  
4 organization in this capacity.

5 Q. And is that what you communicated to the  
6 Alliance for Youth Organizing as well?

7 A. That's correct.

8 Q. Anything else?

9 A. Other than reviewing the files that were  
10 produced, that's it.

11 Q. Okay. And what did the staff of MOVE  
12 Texas Civic Fund search for in providing documents  
13 to respond to this request?

14 A. I directed the staff of MOVE Texas Action  
15 Fund, which, again, is shared with MOVE Texas Civic  
16 Fund, to search their e-mail account, to search  
17 their cloud drives, storage drives, and to search  
18 their computers for a series of terms. There were  
19 nine of them. And they ranged from mail-in ballot,  
20 to signature, to signature rejection.

21 Q. Okay. Thank you for that. And other  
22 than the documents that were produced to us, did you  
23 review any other documents to prepare for the  
24 deposition today?

25 A. No.

1 campuses, community colleges, high schools, but as I  
2 mentioned before, we register anybody to vote and we  
3 assist any Texan.

4 BY MR. STEVENSON:

5 Q. Did you assist Rosalie Weisfeld in  
6 registering to vote?

7 MR. COX: Objection, asked and  
8 answered.

9 But go ahead, Drew.

10 A. Not to my knowledge.

11 BY MR. STEVENSON:

12 Q. What precedents or activities does MOVE  
13 Civic Fund engage in in Hidalgo County?

14 A. Currently, our operations are based out  
15 of Bexar County, Webb County, Guadalupe County, Hays  
16 County, Travis County, Dallas County and Harris  
17 County.

18 Q. Okay. So based on that reply, I'm  
19 guessing that there's not a physical presence in  
20 Hidalgo County; is that correct?

21 A. That is correct. Even though we do  
22 interact with students who are from Hidalgo County  
23 that are at a separate college campus.

24 Q. Okay. And what is the nature of those  
25 interactions?

1 that -- or does the organization have knowledge that  
2 that has actually occurred, specifically somebody  
3 from Hidalgo County received education from Texas  
4 MOVE Civic Fund?

5 A. Yes. We helped a UTSA student about four  
6 weeks ago that was -- this person's a UTSA student,  
7 maybe this was mid-March, and when the coronavirus  
8 situation happened and UTSA closed its doors, this  
9 student went back to Hidalgo County and -- which is  
10 where their parents lived. And they contacted us  
11 with some questions on housing and how to like --  
12 and how to like advocate for student housing and  
13 that kind of stuff. So that is an example of us  
14 interacting with young people from Hidalgo County  
15 that we might know or we might not know where  
16 they're, like, originally from.

17 Q. Okay.

18 MR. STEVENSON: Thank you for your  
19 time today and I'll pass the witness.

20 THE WITNESS: Thank you.

21 MR. MAGEE: Sorry, I couldn't find my  
22 button. I'm going to pass the witness.

23 MR. COX: Okay. Anna, we're just  
24 going to reserve any questions, but if you have any  
25 follow-ups.

## REPORTER'S CERTIFICATION

I, Micheal A. Johnson, Registered Diplomat  
Reporter, Certified Realtime Reporter and Notary  
Public in and for the State of Texas, certify that  
on the 22nd day of May, 2020, I reported the Remote  
Oral Deposition of HILLIARD DREW GALLOWAY, after the  
witness had first been duly cautioned and sworn to  
testify under oath; said deposition was subsequently  
transcribed by me and under my supervision and  
contains a full, true and complete transcription of  
the proceedings had at said time and place; and that  
reading and signing was requested.

I further certify that I am neither counsel  
for nor related to any party in this cause and am  
not financially interested in its outcome.

GIVEN UNDER MY HAND AND SEAL of office on  
this 26th day of May, 2020.



MICHEAL A. JOHNSON RDR, CRR  
NCRA Registered Diplomat Reporter  
NCRA Certified Realtime Reporter

Notary Public in and for the  
State of Texas  
My Commission Expires: 8/8/2020

# Exhibit 74



UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

DR. GEORGE RICHARDSON, ROSALIE §  
WEISFELD, AUSTIN JUSTICE §  
COALITION, COALITION OF TEXANS §  
WITH DISABILITIES, MOVE TEXAS §  
CIVIC FUND, LEAGUE OF WOMEN §  
VOTERS OF TEXAS, and AMERICAN GI §  
FORUM OF TEXAS, INC., §

*Plaintiffs* §

v. §

Civil Case No. 5:19-cv-00963-OG §

TEXAS SECRETARY OF STATE, TRUDY §  
HANCOCK, in her official capacity as §  
BRAZOS COUNTY ELECTIONS §  
ADMINISTRATOR, and PERLA LARA in §  
her official capacity as CITY OF §  
MCALLEN, TEXAS SECRETARY, §

*Defendants.* §

**DECLARATION OF CHASE BEARDEN**

My name is Chase Bearden. I am over the age of 18 and capable of making this declaration. The facts stated herein are within my personal knowledge.

1. I am the Deputy Executive Director of the Coalition of Texans with Disabilities (CTD).
2. CTD is a non-partisan, non-profit membership organization that works to ensure that people with disabilities may “live, work, learn, play, and participate fully in the community of their choice.”
3. CTD has members, including me, who use the mail-in ballot process based on their eligibility due to a disability.

4. CTD organizes events about, advocates around, and educates the public on subjects such as accessible voting, civil rights, and new state level initiatives with the potential to affect the disability community.
5. Depending on the election, CTD informs voters statewide about their ability to cast a mail-in ballot, explains the rules and deadlines related to mail-in ballots, and encourages voters who are eligible to utilize mail-in ballots if they cannot vote in-person.
6. Because persons with disabilities, including me, are especially likely to have variations in signatures because of a disability, CTD's mission is significantly frustrated by the improper rejection of disabled voters' mail-in ballots based on a signature mismatch determination.
7. CTD must divert resources, such as staff and volunteer time and resources, to instruct voters (during trainings, through CTD's website, through CTD's reports, and through email or social media) to write out signatures neatly or to try to make signatures match when completing mail-in ballot applications and carrier envelopes in order to help reduce the chance of an improper rejection due to an alleged signature mismatch.
8. CTD specifically diverts these resources away from other projects, such as educating people with disabilities about other mail-in voting issues, or educating people with disabilities about attendant wages or accessibility issues related to transportation, education, or other forms of voting.

This Declaration is made pursuant to 28 U.S.C. § 1746. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 5, 2020



---

Chase Bearden  
Deputy Executive Director  
Coalition of Texans with Disabilities

# Exhibit 75

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

DR. GEORGE RICHARDSON,	)	
ROSALIE WEISFELD, AUSTIN	)	
JUSTICE COALITION,	)	
COALITION OF TEXANS WITH	)	
DISABILITIES, MOVE TEXAS	)	
CIVIC FUND, LEAGUE OF	)	
WOMEN VOTERS OF TEXAS, and	)	
AMERICAN GI FORUM OF	)	
TEXAS, INC.,	)	
Plaintiffs,	)	
	)	
vs.	)	CASE NO. 5:19-cv-00963
	)	
TEXAS SECRETARY OF STATE,	)	
TRUDY HANCOCK, IN HER	)	
OFFICIAL CAPACITY AS	)	
BRAZOS COUNTY ELECTIONS	)	
ADMINISTRATOR, AND PERLA	)	
LARA IN HER OFFICIAL	)	
CAPACITY AS CITY OF	)	
MCALLEN, TEXAS SECRETARY,	)	
Defendants.	)	

ORAL AND VIDEO DEPOSITION

ROSALIE WEISFELD

MAY 13, 2020

(REPORTED REMOTELY)

1 ORAL AND VIDEO DEPOSITION OF ROSALIE WEISFELD,  
2 produced as a witness at the instance of Defendant Texas  
3 Secretary of State and duly sworn, was taken in the  
4 above-styled and numbered cause on the 13th day of May,  
5 2020, from 2:04 p.m. to 4:40 p.m., before Dana  
6 Richardson, Certified Shorthand Reporter in and for the  
7 State of Texas, reported remotely by computerized  
8 stenotype machine, witness located at the residence of  
9 Rosalie Weisfeld, 9206 Cliffwood Drive, Houston, Texas  
10 77096, pursuant to the Federal Rules of Civil Procedure  
11 and the provisions stated on the record or attached  
12 hereto.

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## APPEARANCES

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## APPEARANCES - (CONT'D)

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CITY OF MCALLEN, TEXAS SECRETARY:

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- and -

Mr. Austin Stevenson - (via webconference)

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## ALSO PRESENT:

Mr. Bruce Erratt, Brazos County - (via web)

Ms. Trudy Hancock - (via web)

Ms. Amelia Christopher, Video Technician - (via web)

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1 THE REPORTER: We're on the record.  
2 Today's date is May 13, 2020. The time is 2:04 p.m.  
3 This is the deposition of Rosalie Weisfeld in the matter  
4 of Dr. George Richardson, Rosalie Weisfeld, Austin  
5 Justin (sic) Coalition, Coalition of Texans With  
6 Disabilities, Move Texas Civic Fund, League of Women  
7 Voters of Texas and American GI Forum of Texas, Inc.,  
8 Plaintiffs, v. Texas Secretary of State, Trudy Hancock,  
9 In Her Official Capacity at Brazos County Elections  
10 Administrator, and Perla Lara In her Official Capacity  
11 as City of McAllen, Texas Secretary, Defendants, pending  
12 in the United States District Court for the Western  
13 District of Texas, San Antonio Division in Civil Action  
14 No. 5:19-cv-00963, and is being conducted by the Federal  
15 Rules and agreement of the parties to the remote  
16 swearing of the witness.

17 The witness located at 9206 Cliffwood  
18 Drive, Houston, Texas 77096.

19 My name is Dana Richardson, Texas  
20 Certified Shorthand Reporter No. 5386. I am  
21 administering the oath and reporting the deposition  
22 remotely by stenographic means from my residence within  
23 the state of Texas. My business address is care of  
24 Integrity Legal Support Solutions, P.O. Box 245,  
25 Manchaca, Texas 78652.

1 Ms. Weisfeld, please raise your right hand  
2 to be sworn.

3 (Witness sworn)

4 THE REPORTER: And, Counsel, would you  
5 please state your appearance and location for the  
6 record, beginning with Plaintiff counsel.

7 MR. DOLLING: Hi. This is Zachary Dolling  
8 for the plaintiffs. I'm in Houston, Texas.

9 MR. MIRZA: My name is Hani Mirza with the  
10 Texas Civil Rights Project. I'm also representing  
11 Plaintiffs. And I'm in Dallas, Texas.

12 MR. KALAR: Also for the plaintiffs, I'm  
13 Samuel Kalar of the law firm Willkie, Farr & Gallagher.  
14 And I am dialing in from New York, New York.

15 MS. SURIANI: And also for the plaintiffs,  
16 I am JoAnna Suriani with the law firm Willkie, Farr &  
17 Gallagher. I'm in Washington, DC.

18 MR. TAWIL: My name is Isaac Tawil,  
19 attorney for Perla Lara in her official capacity of  
20 Secretary of City of McAllen. I'm in McAllen, Texas.

21 MR. MAGEE: I'm Eric Magee. I represent  
22 Trudy Hancock in her official capacity as the Brazos  
23 County Elections Administrator. And I'm in Austin,  
24 Texas.

25 MS. MACKIN: My name is Anna Mackin with

1 **signature verification committee?**

2 A. Yes. But we called it the early voting ballot  
3 board.

4 **Q. Okay. So did you serve on an early voting**  
5 **ballot board?**

6 A. Yes. And the signature verification committee  
7 was a component of the early voting ballot board.

8 **Q. Okay. Did you have to fill out an application**  
9 **to -- to volunteer to do that?**

10 A. No.

11 **Q. Did you -- did you have to receive some form of**  
12 **appointment?**

13 A. Yes.

14 **Q. Do you know who made that appointment?**

15 A. Either the Democratic Party chair -- but it --  
16 or the -- probably the Democratic Party chair, but the  
17 confirmation came through the county commissioner's  
18 court. It -- so it could have been the county judge or  
19 one of the county commissioners.

20 **Q. Okay. So you -- did you receive some**  
21 **notification from the county court?**

22 A. I received a notification either through the  
23 party or the election administrator.

24 **Q. Okay. And did you serve on the signature**  
25 **verification committee component of the EBBB that you**

1 STATE OF TEXAS  
2 COUNTY OF MONTGOMERY

3 REPORTER'S CERTIFICATE

4 I, Dana Richardson, a Certified Shorthand Reporter  
5 in and for the State of Texas, do certify that this  
6 deposition transcript is a true record of the testimony  
7 given by the witness named herein, after said witness  
8 was duly sworn by me. The witness was requested to  
9 review the deposition.

10 I further certify that I am neither attorney or  
11 counsel for, related to, nor employed by any parties to  
12 the action in which this testimony is taken and,  
13 further, that I am not a relative or employee of any  
14 counsel employed by the parties hereto or financially  
15 interested in the action.

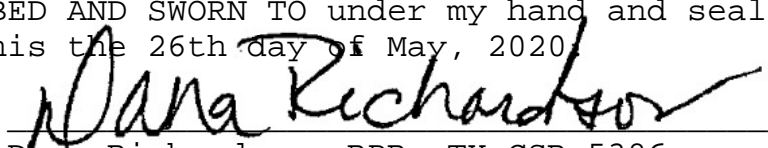
16 I further certify that the amount of time used by  
17 each party at the deposition is as follows:

18 Ms. Anna Mackin - 01:41

19 Mr. Isaac Tawil - 00:20

20 Mr. Zachary D. Dolling - 00:01

21 SUBSCRIBED AND SWORN TO under my hand and seal of  
22 office on this the 26th day of May, 2020

23   
Dana Richardson, RPR, TX CSR 5386

24 Expiration: 01/31/22

25 Integrity Legal Support Solutions

Firm Registration No. 528

PO Box 245

Manchaca, Texas 78652

(512) 320-8690

(512) 320-8692 (fax)

# Exhibit 76

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

DR. GEORGE RICHARDSON;  
ROSALIE WEISFELD; AUSTIN JUSTICE  
COALITION; COALITION OF TEXANS  
WITH DISABILITIES; MOVE TEXAS  
CIVIC FUND; LEAGUE OF WOMEN  
VOTERS OF TEXAS; and AMERICAN GI  
FORUM OF TEXAS, INC.,

Plaintiffs,

v.

TEXAS SECRETARY OF STATE; TRUDY  
HANCOCK, in her official  
capacity as BRAZOS COUNTY  
ELECTIONS ADMINISTRATOR; and  
PERLA LARA, in her official  
capacity as CITY OF McALLEN,  
TEXAS, SECRETARY,

Defendants.

\*\*\*\*\*  
REMOTE VIDEOTAPED 30(b)(6) DEPOSITION OF  
BRIAN KEITH INGRAM  
May 11, 2020  
\*\*\*\*\*

REMOTE VIDEOTAPED 30(b)(6) DEPOSITION OF

BRIAN KEITH INGRAM, produced as a witness at the  
instance of the Plaintiffs, and duly sworn, was  
taken in the above-styled and numbered cause on  
May 11, 2020, from 1:37 p.m. to 4:17 p.m.,  
remotely before Rebecca A. Graziano, CSR, RPR,  
CRR, in and for the State of Texas, reported by  
machine shorthand, pursuant to the Federal Rules  
of Civil Procedure and the provisions stated on  
the record.

**CERTIFIED  
TRANSCRIPT**

A P P E A R A N C E S

REPRESENTING THE PLAINTIFFS:

Mr. Ryan Cox (via videoconference)  
Mr. Hani Mirza (via videoconference)  
Mr. Zachary D. Dolling (via videoconference)  
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and

Mr. Samuel Kalar (via videoconference)  
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ADMINISTRATOR:

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A P P E A R A N C E S

REPRESENTING THE DEFENDANT, PERLA LARA, in her  
official capacity as CITY OF McALLEN, TEXAS,  
SECRETARY:

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Mr. Austin W. Stevenson (via videoconference)  
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VIDEOCONFERENCE TECHNICIAN:

Ms. Maygun Flanagan

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PROCEEDINGS

(On the record at 1:37 p.m.)

THE VIDEOGRAPHER: We are going on the video record. Today is May 11th, 2020. The time is 1:37 p.m.

The civil action number is 5:19-cv-00963-OLG in the matter of Dr. George Richardson, et al., versus Texas Secretary of State. The deponent is Texas Secretary of State 30(b)(6), Keith Ingram. The video deposition is requested by the plaintiffs' counsel, Texas Civil Rights Project, Austin.

My name is Maygun Flanagan. I'm the videographer. The court reporter today is Becky Graziano. We are both representing HG Litigation Services.

Would counsel like to state their appearances on the record or transcript?

MR. MIRZA: Hello. Can you hear me?

THE VIDEOGRAPHER: Yes.

MR. MIRZA: Oh, you can hear me? Okay.

I'd like to -- we can state it on

1 the record. My name is Hani Mirza. I'm  
2 with the Texas Civil Rights Project, and  
3 I'm representing plaintiffs.

4 MR. COX: Ryan Cox, also with the  
5 Texas Civil Rights Project on behalf of  
6 the plaintiffs.

7 MS. MACKIN: Anna Mackin with the  
8 Texas Office of the Attorney General,  
9 representing the defendant Texas Secretary  
10 of State, in her official capacity.

11 MR. MAGEE: This is Eric Magee.  
12 I'm here on behalf of defendant Trudy  
13 Hancock, the Brazos County  
14 electric -- elections administrator, in  
15 her official capacity.

16 MR. TAWIL: Isaac Tawil on behalf  
17 of Perla Lara, City of McAllen city  
18 secretary.

19 MR. KALAR: On behalf of  
20 plaintiffs, Samuel Kalar of the law firm  
21 Willkie Farr & Gallagher.

22 MS. SURIANI: And Joanna Suriani  
23 from the law firm Willkie Farr & Gallagher  
24 on behalf of plaintiff.

25 THE VIDEOGRAPHER: The deponent may

1 now be sworn in.

2 (Witness duly sworn.)

3 BRIAN KEITH INGRAM,  
4 being first duly sworn, testified as follows:

5 EXAMINATION

6 BY MR. MIRZA:

7 Q Okay. Welcome back, Mr. Ingram. I'm  
8 going -- can you please state your full name for  
9 the record?

10 A Brian Keith Ingram.

11 Q And do you remember the general guidelines  
12 I spoke about for depositions this morning?

13 A Yes.

14 Q Are your responses to those  
15 questions -- to the questions related to those  
16 guidelines the same?

17 A Yes.

18 Q And you are the director of elections,  
19 correct, for the Secretary of State?

20 A I am.

21 Q Okay. And what did you do to prepare for  
22 this deposition?

23 A Well, I reviewed some documents and I met  
24 with my attorneys.

25 Q Okay. Did you review -- did you review

1       A       Okay. I'm done.

2       Q       Okay. Do you believe what is mentioned  
3 here complies with the Texas Election Code?

4               MS. MACKIN: Objection; form.

5               THE WITNESS: I do.

6 BY MR. MIRZA:

7       Q       Okay.

8       A       Yes, it does.

9       Q       Okay. So early voting clerks -- well, let  
10 me rephrase it.

11              Can early voting clerks help early  
12 voting ballot boards manage the review of mail-in  
13 ballots?

14       A       The early voting clerk is responsible for  
15 all the early voting activity, including the  
16 ballot board, yes.

17       Q       Okay. And they -- so they can help manage  
18 the -- their -- the signature verification review  
19 of the mail-in ballots?

20       A       It says that they answer questions and  
21 they "deliver all replies backed by the election  
22 code." So if they have a question, the ballot  
23 board has a question, then the person answering  
24 this responds with election code provisions, and  
25 they use the ballot board manual and direct them

1 as needed to follow the manual. That's perfectly  
2 right.

3 They "open, reconcile, close, and lock  
4 everything for the board," which is what they're  
5 supposed to do because they're the custodian of  
6 records, and have the judges sign off on all of  
7 the forms. That's all perfectly fine.

8 Q Okay. Okay. And then this is -- I think  
9 I'm on Exhibit 6 or -- I'm going to mark this as  
10 Bates Number SOS\_001411.

11 (Exhibit 6 marked.)

12 BY MR. MIRZA:

13 Q I'm going to have you review the document.  
14 Let me know when you want me to scroll down.

15 A Okay. Okay. Okay.

16 Q Okay. This appears to be more survey  
17 responses by local election officials; correct?

18 A It does.

19 Q Okay. If you could review the first row  
20 of the page and let me know when you're done.

21 A I'm done.

22 Q Okay. Does the process listed in the  
23 longer paragraph comply -- in that row comply with  
24 the Texas Election Code?

25 A It does.



1 MS. MACKIN: Objection; form.

2 BY MR. MIRZA:

3 Q And so this process does not conflict in  
4 any way with SOS guidance?

5 A It doesn't appear to. Asking a board for  
6 an explanation and then explaining to them what  
7 the law is does not conflict with anything. It's  
8 probably a good idea.

9 Q Okay. And local election officials are  
10 allowed to create, what's stated here, "a  
11 shorter/more laymen-friendly version of --  
12 version," end quote, of SOS manuals?

13 A Yeah. I'd prefer that we review it before  
14 they use it, if we're going to use that one or  
15 not.

16 Q Okay. This document starts at  
17 Bates SOS\_1935 and ends at Bates SOS\_1937. We'll  
18 mark this as Exhibit 7.

19 (Exhibit 7 marked.)

20 BY MR. MIRZA:

21 Q And I'll give you a chance to review this.  
22 Let me know when you want me to scroll down.

23 A Yes, scroll down. Go down. Go down. Go  
24 down, down. Go down. Go down. Okay.

25 Q Okay. On Bates SOS\_00137 [sic], can

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

DR. GEORGE RICHARDSON;  
ROSALIE WEISFELD; AUSTIN JUSTICE  
COALITION; COALITION OF TEXANS  
WITH DISABILITIES; MOVE TEXAS  
CIVIC FUND; LEAGUE OF WOMEN  
VOTERS OF TEXAS; and AMERICAN GI  
FORUM OF TEXAS, INC.,

Plaintiffs,

v.

TEXAS SECRETARY OF STATE; TRUDY  
HANCOCK, in her official  
capacity as BRAZOS COUNTY  
ELECTIONS ADMINISTRATOR; and  
PERLA LARA, in her official  
capacity as CITY OF McALLEN,  
TEXAS, SECRETARY,

Defendants.

Civil Case No.  
5:19-cv-00963-OLG

REPORTER'S CERTIFICATION  
REMOTE VIDEOTAPED DEPOSITION OF  
BRIAN KEITH INGRAM  
May 11, 2020

I, Rebecca A. Graziano, Certified Shorthand  
Reporter in and for the State of Texas, hereby  
certify to the following:

That the witness, BRIAN KEITH INGRAM, was  
duly sworn and that the transcript of the oral  
deposition is a true record of the testimony given  
by the witness;

I further certify that pursuant to FRCP Rule  
30(f)(1) that the signature of the deponent:

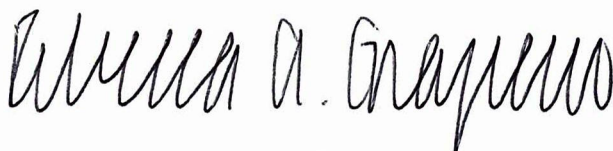
1            \_\_\_\_ was requested by the deponent or a  
2            party before the completion of the deposition and  
3            returned within 30 days from date of receipt of  
4            the transcript. If returned, the attached Changes  
5            and Signature Page contains any changes and the  
6            reasons therefor.

7              X   was not requested by the deponent or a  
8            party before the completion of the deposition.

9            I further certify that I am neither attorney  
10           nor counsel for, related to, nor employed by any  
11           of the parties to the action in which this  
12           testimony was taken.

13           Further, I am not a relative or employee of  
14           any attorney of record in this cause, nor do I  
15           have a financial interest in the action.

16           Subscribed and sworn to on this   26   day of  
17             MAY  , 2020.

18  
19  
20  
21           

22           Rebecca A. Graziano, CSR, RPR, CRR  
23           Texas CSR No. 9306  
24           Expiration Date: 07/31/22  
25           DALLAS 69

# Exhibit 77

RICHARDSON: TRUDY HANCOCK

Page 1

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

DR. GEORGE RICHARDSON;  
ROSALIE WEISFELD; AUSTIN JUSTICE  
COALITION; COALITION OF TEXANS  
WITH DISABILITIES; MOVE TEXAS  
CIVIC FUND; LEAGUE OF WOMEN  
VOTERS OF TEXAS; and AMERICAN GI  
FORUM OF TEXAS, INC.,

Plaintiffs,

v.

TEXAS SECRETARY OF STATE; TRUDY  
HANCOCK, in her official  
capacity as BRAZOS COUNTY  
ELECTIONS ADMINISTRATOR; and  
PERLA LARA, in her official  
capacity as CITY OF McALLEN,  
TEXAS, SECRETARY,

Defendants.

Civil Case No.  
5:19-cv-00963-OLG

**CERTIFIED  
TRANSCRIPT**

\*\*\*\*\*  
REMOTE VIDEOTAPED DEPOSITION OF  
TRUDY HANCOCK  
May 5, 2020  
\*\*\*\*\*

REMOTE VIDEOTAPED DEPOSITION OF TRUDY HANCOCK,  
produced as a witness at the instance of the  
Plaintiffs, and duly sworn, was taken in the  
above-styled and numbered cause on May 5, 2020,  
from 9:39 a.m. to 1:44 p.m., remotely before  
Rebecca A. Graziano, CSR, RPR, CRR, in and for the  
State of Texas, reported by machine shorthand,  
pursuant to the Federal Rules of Civil Procedure  
and the provisions stated on the record.

## A P P E A R A N C E S

## REPRESENTING THE PLAINTIFFS:

Mr. Hani Mirza (via videoconference)  
Mr. Zachary D. Dolling (via videoconference)  
TEXAS CIVIL RIGHTS PROJECT  
1405 Montopolis Drive  
Austin, Texas 78741  
(512) 474-5073  
hani@texascivilrightsproject.org  
zachary@texascivilrightsproject.org

and

Mr. Samuel Kalar (via videoconference)  
Ms. Joanna Suriani (via videoconference)  
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STATE:

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ADMINISTRATOR:

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A P P E A R A N C E S

REPRESENTING THE DEFENDANT, PERLA LARA, in her  
official capacity as CITY OF McALLEN, TEXAS,  
SECRETARY:

Mr. Isaac J. Tawil (via videoconference)  
Mr. Austin W. Stevenson (via videoconference)  
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itawil@mcallen.net  
astevenson@mcallen.net

VIDEOCONFERENCE TECHNICIAN:

Mr. Justin McAdams

ALSO PRESENT:

Mr. Bruce Erratt (via videoconference)

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PROCEEDINGS

(On the record at 9:39 a.m.)

(Witness duly sworn.)

TRUDY HANCOCK,

being first duly sworn, testified as follows:

EXAMINATION

BY MR. KALAR:

Q Good morning, Ms. Hancock.

A Good morning.

Q My name is Sam Kalar, and I'm an attorney representing the plaintiffs in this case, and I will be taking your deposition today.

First things off, please state and spell your first name.

A Trudy Hancock, T-r-u-d-y, H-a-n-c-o-c-k.

Q I'd like to go over a few general rules to make sure we're both on the same page about how things should go today.

Have you ever been deposed before?

A Yes.

Q This might all sound familiar.

So in addition to being videotaped, my questions and your answers are being recorded by a court reporter. Because of this, I'm going to ask that you give verbal answers so that the record is

1 election, like a primary, then the party pays  
2 them.

3 **Q And how is the EVBB budget determined?**

4 A I don't -- as far as I know, they don't  
5 have a budget.

6 **Q Does the money that goes towards their**  
7 **salaries come from your office?**

8 A No.

9 **Q Where does it come from?**

10 A It comes out of the county general budget.  
11 If it's a -- if it's a general election and the  
12 county's paying them, then it comes out of the  
13 general budget as a payroll --

14 **Q And who supervises -- oh, apologies.**

15 A I'm sorry -- as a payroll expense.

16 **Q And who supervises the EVBB?**

17 A The early -- the EVBB judge.

18 **Q And who supervises the EVBB judge?**

19 A No one, to my knowledge.

20 **Q If the EVBB rejects a mail-in ballot for**  
21 **any reason, what happens?**

22 A They fill out a letter letting them know  
23 why their ballot was rejected, and then they turn  
24 those over to myself, and we make copies of those  
25 letters and mail them out to them.

1 Q Do you see that?

2 A I do.

3 Q What does your office do to implement this  
4 recommendation?

5 A When the early voting ballot board turns  
6 the paperwork over to us at the end of the day, we  
7 copy those letters, put them in envelopes, address  
8 them, and mail them out the next mailing day.

9 Q And was this procedure implemented after  
10 you received this advisory?

11 A That has been our procedure.

12 Q You always receive the ballots from the  
13 advisory -- excuse me. Withdrawn.

14 You receive the rejected ballots from  
15 the EVBB, and then the following day, you mail out  
16 the notices?

17 A Yes, sir. If it -- well, if it's a -- the  
18 next mailing day. If it's a Saturday, the mail  
19 won't go out until Monday.

20 Q So if it's a Saturday, you would mail out  
21 the notices on Monday?

22 A Correct.

23 Q So with respect to this specific election  
24 advisory, did any policy or procedure of your  
25 office change?

1 A No, sir.

2 Q Did you speak with anyone at the EVBB  
3 about this advisory?

4 A No, sir.

5 Q Did you speak with any other county  
6 election officials about this advisory?

7 A Only my staff, and we didn't speak of the  
8 advisory itself. That's just our normal  
9 procedure.

10 Q Did you speak about this bolded  
11 recommendation with anyone on your staff?

12 A No, because that is already our process.

13 Q And what is the benefit of mailing notices  
14 of rejected ballots out as soon as possible?

15 A To notify the voter.

16 Q And why is it beneficial to notify them  
17 earlier rather than later?

18 A I had -- the way the mail service is,  
19 there's not really a benefit to mailing it out as  
20 soon as possible, because they're not going to get  
21 it prior to election day.

22 Q When do you usually receive the notices  
23 from the EVBB that you then mail out?

24 A At the end of the day, when they're  
25 through processing their ballots, they turn all

1 the paperwork back to us. We get the ballots in a  
2 locked box, any rejected ballots with their  
3 letters, and their receipts showing that they  
4 received those ballot boxes. I'll come back to my  
5 office for retention, and then at that time, we  
6 process those letters.

7 **Q And this is always on the same day that**  
8 **the EVBB meets?**

9 A Correct.

10 **Q And on what days does the EVBB meet?**

11 A Generally it's the Saturday before the  
12 election, they meet election day, and then they  
13 meet six days after the election.

14 **Q So they usually meet twice during an**  
15 **election period; is that correct?**

16 A Two to three times, determinant on -- it's  
17 just determined by how large that election is and  
18 then the need.

19 **Q I'm sorry. I didn't catch that.**  
20 **Determined by what?**

21 A The size of the election and if there's a  
22 need for them to meet more than once.

23 **Q And who determines how often they meet?**

24 A For our county, our size, they always meet  
25 the weekend before to process those -- those

1 ballots. Then they meet again election day to  
2 process anything that came in after, and then  
3 they're required to meet six -- at least six days  
4 after the election to process any late ballots or  
5 provisionals. So it's set out in the code.

6 **Q Could they meet additional times if they**  
7 **chose?**

8 A If it's necessary. The board -- the judge  
9 would set those times.

10 **Q And who makes that decision?**

11 A The EVBB judge.

12 **Q And where does the EVBB meet in Brazos**  
13 **County?**

14 A Currently they meet in the training room  
15 in my office at the Ruth McLeod Building.

16 **Q And do they coordinate with your office**  
17 **every time they meet on logistics?**

18 A Correct.

19 **Q Is your office generally in contact with**  
20 **the EVBB throughout their process?**

21 A We're on-site in case they need any backup  
22 of documentation.

23 **Q So when the EVBB meets, is somebody from**  
24 **your office present?**

25 A We're in the office, but we are not in

1 with the board.

2 Q And who from your office is in the office  
3 during those times?

4 A Typically myself, Krystal Ocon, and  
5 Victoria Elliott.

6 Q And that's every time the EVBB meets for  
7 every election?

8 A Yes.

9 Q Is there anything in the Texas Election  
10 Code that dictates when you need to mail a  
11 rejection notice to a voter?

12 A Not to my knowledge.

13 Q But it is your office's practice to mail  
14 that notice the day after receiving it from the  
15 EVBB; correct?

16 A Correct.

17 Q And what was your process in Robertson  
18 County?

19 A It was similar.

20 Q Was it the same?

21 A In Robertson County, they're smaller. So  
22 by population, their early voting ballot board  
23 does not meet until the day before the election.  
24 They can't meet until -- because of their size,  
25 they can't meet as early, and so most of the time,

RICHARDSON: TRUDY HANCOCK

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

DR. GEORGE RICHARDSON; )  
ROSALIE WEISFELD; AUSTIN JUSTICE )  
COALITION; COALITION OF TEXANS )  
WITH DISABILITIES; MOVE TEXAS )  
CIVIC FUND; LEAGUE OF WOMEN )  
VOTERS OF TEXAS; and AMERICAN GI )  
FORUM OF TEXAS, INC., )

Plaintiffs, )

v. )

TEXAS SECRETARY OF STATE; TRUDY )  
HANCOCK, in her official )  
capacity as BRAZOS COUNTY )  
ELECTIONS ADMINISTRATOR; and )  
PERLA LARA, in her official )  
capacity as CITY OF McALLEN, )  
TEXAS, SECRETARY, )

Defendants. )

Civil Case No.  
5:19-cv-00963-OLG

REPORTER'S CERTIFICATION  
REMOTE VIDEOTAPED DEPOSITION OF  
TRUDY HANCOCK  
May 5, 2020

I, Rebecca A. Graziano, Certified Shorthand  
Reporter in and for the State of Texas, hereby  
certify to the following:

That the witness, TRUDY HANCOCK, was duly  
sworn and that the transcript of the oral  
deposition is a true record of the testimony given  
by the witness;

I further certify that pursuant to FRCP Rule  
30(f)(1) that the signature of the deponent:



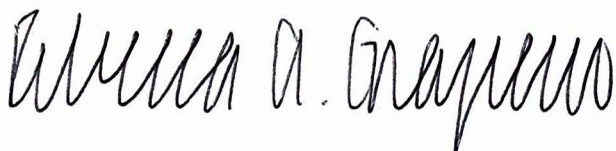
1            \_\_\_\_ was requested by the deponent or a  
2            party before the completion of the deposition and  
3            returned within 30 days from date of receipt of  
4            the transcript. If returned, the attached Changes  
5            and Signature Page contains any changes and the  
6            reasons therefor.

7              X   was not requested by the deponent or a  
8            party before the completion of the deposition.

9            I further certify that I am neither attorney  
10           nor counsel for, related to, nor employed by any  
11           of the parties to the action in which this  
12           testimony was taken.

13           Further, I am not a relative or employee of  
14           any attorney of record in this cause, nor do I  
15           have a financial interest in the action.

16           Subscribed and sworn to on this   18   day of  
17           MAY\_\_\_\_\_, 2020.

18  
19  
20  
21           

22           Rebecca A. Graziano, CSR, RPR, CRR  
23           Texas CSR No. 9306  
24           Expiration Date: 07/31/22  
25           DALLAS 69

# Exhibit 78

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

DR. GEORGE RICHARDSON;  
ROSALIE WEISFELD; AUSTIN JUSTICE  
COALITION; COALITION OF TEXANS  
WITH DISABILITIES; MOVE TEXAS  
CIVIC FUND; LEAGUE OF WOMEN  
VOTERS OF TEXAS; and AMERICAN GI  
FORUM OF TEXAS, INC.,

Plaintiffs,

v.

TEXAS SECRETARY OF STATE; TRUDY  
HANCOCK, in her official  
capacity as BRAZOS COUNTY  
ELECTIONS ADMINISTRATOR; and  
PERLA LARA, in her official  
capacity as CITY OF McALLEN,  
TEXAS, SECRETARY,

Defendants.

Civil Case No.  
5:19-cv-00963-OLG

**CERTIFIED  
TRANSCRIPT**

\*\*\*\*\*  
VIDEOTAPED REMOTE 30(b)(6) DEPOSITION OF  
TRUDY HANCOCK  
May 5, 2020  
\*\*\*\*\*

VIDEOTAPED REMOTE 30(b)(6) DEPOSITION OF  
TRUDY HANCOCK, produced as a witness at the  
instance of the Plaintiffs, and duly sworn, was  
taken in the above-styled and numbered cause on  
May 5, 2020, from 1:44 p.m. to 3:30 p.m., remotely  
before Rebecca A. Graziano, CSR, RPR, CRR, in and  
for the State of Texas, reported by machine  
shorthand, pursuant to the Federal Rules of Civil  
Procedure and the provisions stated on the record.

A P P E A R A N C E S

REPRESENTING THE PLAINTIFFS:

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and

Mr. Samuel Kalar (via videoconference)  
Ms. Joanna Suriani (via videoconference)  
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Mr. Austin W. Stevenson (via videoconference)  
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itawil@mcallen.net  
astevenson@mcallen.net

VIDEOCONFERENCE TECHNICIAN:

Mr. Justin McAdams

ALSO PRESENT:

Mr. Bruce Erratt (via videoconference)

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PROCEEDINGS

(On the record at 1:44 p.m.)

(Witness duly sworn.)

TRUDY HANCOCK,

being first duly sworn, testified as follows:

EXAMINATION

BY MR. KALAR:

Q Hello again, Ms. Hancock.

Do you understand that this portion of the deposition -- or in this portion of the deposition, you will be testifying on behalf of Brazos County?

A Yes, sir.

Q And all the guidelines that I talked about this morning in terms of talking over each other, sharing of documents, things like that, those are all in effect. Does that make sense?

A Yes, sir.

Q Okay. And once again, can you please state your full name for the record?

A Trudy Hancock.

Q And what is your current position?

A Elections administrator for Brazos County.

Q And other than what we talked about this morning, what did you do to prepare for this



1 A Yes.

2 Q Do you see the very bottom note reads:  
3 "The board, like the committee, may also compare  
4 signatures with any two or more signatures of the  
5 voter made within the preceding six years and on  
6 file with the voter registrar."

7 Do you see that?

8 A Yes.

9 Q What is your understanding of what that  
10 means?

11 A The board can ask to see any voter  
12 registration applications that we have on  
13 our -- on file in our office up to six years.

14 Q And where are those records stored?

15 A We maintain those electronically.

16 Q And that is the office of the elections  
17 administrator that retains those?

18 A Correct.

19 Q Are those records a part of the 22-month  
20 shredding policy that you have?

21 A No. Those are permanent records.

22 Q So those records are kept indefinitely?

23 A Correct.

24 Q So if the early voting ballot board wants  
25 to compare additional signatures, how would they

1 go about attaining those records?

2 A The early voting ballot board judge would  
3 come to my office and ask us to print those for  
4 them.

5 Q And just to confirm, he would essentially  
6 walk next door to your office from the meeting  
7 room that he's in?

8 A Correct.

9 Q And what information would he provide you  
10 to find those records?

11 A The name and the VUID, voter unique  
12 identifier, for that voter, and we would print  
13 those records for him.

14 Q And would you personally get that request  
15 or somebody in your office?

16 A Just depends. If I was busy, then someone  
17 else in the office would see to it.

18 Q And what is the process like to find those  
19 records?

20 A You just search the name in the voter  
21 registration database in Laserfiche, print the  
22 records that are up to six years old.

23 Q And then you would bring them back to the  
24 judge, or he would wait in your office for them?

25 A Normally, he would just wait for those.

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

DR. GEORGE RICHARDSON;  
ROSALIE WEISFELD; AUSTIN JUSTICE  
COALITION; COALITION OF TEXANS  
WITH DISABILITIES; MOVE TEXAS  
CIVIC FUND; LEAGUE OF WOMEN  
VOTERS OF TEXAS; and AMERICAN GI  
FORUM OF TEXAS, INC.,

Plaintiffs,

v.

TEXAS SECRETARY OF STATE; TRUDY  
HANCOCK, in her official  
capacity as BRAZOS COUNTY  
ELECTIONS ADMINISTRATOR; and  
PERLA LARA, in her official  
capacity as CITY OF McALLEN,  
TEXAS, SECRETARY,

Defendants.

Civil Case No.  
5:19-cv-00963-OLG

REPORTER'S CERTIFICATION  
REMOTE VIDEOTAPED 30(b)(6) DEPOSITION OF  
TRUDY HANCOCK  
May 5, 2020

I, Rebecca A. Graziano, Certified Shorthand  
Reporter in and for the State of Texas, hereby  
certify to the following:

That the witness, TRUDY HANCOCK, was duly  
sworn and that the transcript of the oral  
deposition is a true record of the testimony given  
by the witness;

I further certify that pursuant to FRCP Rule  
30(f)(1) that the signature of the deponent:

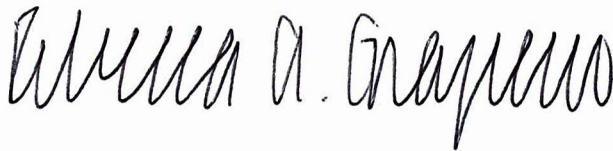
1            \_\_\_\_ was requested by the deponent or a  
2            party before the completion of the deposition and  
3            returned within 30 days from date of receipt of  
4            the transcript. If returned, the attached Changes  
5            and Signature Page contains any changes and the  
6            reasons therefor.

7              X   was not requested by the deponent or a  
8            party before the completion of the deposition.

9            I further certify that I am neither attorney  
10           nor counsel for, related to, nor employed by any  
11           of the parties to the action in which this  
12           testimony was taken.

13           Further, I am not a relative or employee of  
14           any attorney of record in this cause, nor do I  
15           have a financial interest in the action.

16           Subscribed and sworn to on this   18   day of  
17             MAY  , 2020.

18  
19  
20  
21           

22           Rebecca A. Graziano, CSR, RPR, CRR  
23           Texas CSR No. 9306  
24           Expiration Date: 07/31/22  
25           DALLAS 69

# Exhibit 79

RICHARDSON: PERLA LARA

Page 1

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

DR. GEORGE RICHARDSON;  
ROSALIE WEISFELD; AUSTIN JUSTICE  
COALITION; COALITION OF TEXANS  
WITH DISABILITIES; MOVE TEXAS  
CIVIC FUND; LEAGUE OF WOMEN  
VOTERS OF TEXAS; and AMERICAN GI  
FORUM OF TEXAS, INC.,

Plaintiffs,

v.

TEXAS SECRETARY OF STATE; TRUDY  
HANCOCK, in her official  
capacity as BRAZOS COUNTY  
ELECTIONS ADMINISTRATOR; and  
PERLA LARA, in her official  
capacity as CITY OF McALLEN,  
TEXAS, SECRETARY,

Defendants.

Civil Case No.  
5:19-cv-00963-OLG

**CERTIFIED  
TRANSCRIPT**

\*\*\*\*\*  
REMOTE VIDEOTAPED DEPOSITION OF  
PERLA LARA  
May 14, 2020  
\*\*\*\*\*

REMOTE VIDEOTAPED DEPOSITION OF PERLA LARA,  
produced as a witness at the instance of the  
Plaintiffs, and duly sworn, was taken in the  
above-styled and numbered cause on May 14, 2020,  
from 9:34 a.m. to 1:40 p.m., remotely before  
Rebecca A. Graziano, CSR, RPR, CRR, in and for the  
State of Texas, reported by machine shorthand,  
pursuant to the Federal Rules of Civil Procedure  
and the provisions stated on the record.

A P P E A R A N C E S

REPRESENTING THE PLAINTIFFS:

Mr. Hani Mirza (via videoconference)  
Mr. Ryan Cox (via videoconference)  
Mr. Zachary D. Dolling (via videoconference)  
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ADMINISTRATOR:

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A P P E A R A N C E S

REPRESENTING THE DEFENDANT, PERLA LARA, in her  
official capacity as CITY OF McALLEN, TEXAS,  
SECRETARY:

Mr. Isaac J. Tawil (via videoconference)  
Mr. Austin W. Stevenson (via videoconference)  
CITY OF McALLEN CITY ATTORNEY'S OFFICE  
1300 Houston Avenue, Second Floor  
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(956) 681-3111  
itawil@mcallen.net  
astevenson@mcallen.net

ALSO PRESENT:

Mr. Bruce Erratt (via videoconference)

VIDEOCONFERENCE TECHNICIAN:

Ms. Maygun Flanagan



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PROCEEDINGS

(On the record at 9:34 a.m.)

THE VIDEOGRAPHER: We are going on the video record. Today is May 14th, 2020. The time is 9:34 a.m.

The civil action number is 5:19-cv-00963-OLG in the matter of Dr. George Richardson, et al., versus Texas Secretary of State. The deponent is Perla Lara. The video deposition is requested by plaintiffs' counsel, Texas Civil Rights Project, Austin.

My name is Maygun Flanagan. I'm the videographer. The court reporter today is Becky Graziano. We are both representing HG Litigation Services.

Will counsel please identify themselves for the record?

MR. COX: My name is Ryan Cox, C-o-x, with the Texas Civil Rights Project on behalf of the plaintiffs.

MR. STEVENSON: Austin --

MR. TAWIL: Isaac --

MR. STEVENSON: -- Stevenson, S-t-e-v-e-n-s-o-n, for Perla Lara in her

1 official capacity as the McAllen city  
2 secretary.

3 MR. TAWIL: Isaac Tawil for  
4 Ms. Lara as well.

5 THE VIDEOGRAPHER: Okay. The  
6 deponent may now be sworn in.

7 MR. COX: We do have some  
8 other -- I'm sorry. We do have some other  
9 folks here from TCRP, but they may be  
10 coming in and out.

11 But if any of you-all did want to  
12 make an appearance, now would be the time  
13 to do that.

14 MR. MIRZA: Yeah. This is  
15 Hani -- Hani Mirza with the Texas Civil  
16 Rights Project on behalf of plaintiffs.

17 MR. KALAR: Also on behalf of  
18 plaintiffs, this is Samuel Kalar with the  
19 law firm Willkie Farr & Gallagher.

20 MS. SURIANI: And also on behalf of  
21 plaintiffs, this is Joanna Suriani with  
22 the law firm Willkie Farr & Gallagher.

23 MR. MAGEE: This is Eric Magee.  
24 I'm with defendant Trudy Hancock in her  
25 official capacity as the Brazos County

elections administrator.

MS. MACKIN: And this is Anna Mackin. I represent the defendant Texas Secretary of State, sued in her official capacity.

(Witness duly sworn.)

PERLA LARA,  
being first duly sworn, testified as follows:

EXAMINATION

BY MR. COX:

Q Excellent. Thank you, Ms. Lara.

Good morning. My name is Ryan Cox. I'm an attorney, like I said, with the Texas Civil Rights Project on behalf of the plaintiffs, and so I'm going to be conducting your deposition today.

To start things off, can you please just state and spell your name for the record?

A Perla Lara, P-e-r-l-a, Lara, L-a-r-a.

Q Okay. Have you ever been deposed before?

A No.

Q Okay. So, you know, here at the beginning, I like to go over kind of a few general rules, you know, for this deposition, make sure we're clear on a few things.

The first thing is that, you know, in

1 Q Okay. And so if -- if, say, the --  
2 someone that you report to, like the mayor or the  
3 city commission, I believe you said, came to you  
4 with an issue about an election, would they be  
5 able to direct your actions on that, or do you  
6 exercise kind of independent authority to  
7 administer the elections?

8 MR. TAWIL: Objection; form.

9 BY MR. COX:

10 Q Did that question make sense? I'm sorry.

11 A I -- I usually come to my -- we have  
12 several assistant city attorneys, and I usually  
13 consult with them.

14 Q Okay.

15 A Yeah.

16 Q But someone like the mayor or people you  
17 report to directly wouldn't direct your actions as  
18 to how to conduct an election; is that correct?  
19 Or is that a fair statement?

20 A Correct.

21 Q Okay. Now, how does your office receive  
22 funding?

23 A We budget. It's budgeted. We don't get  
24 funding like our elections administrator. It's  
25 the -- I -- every election year, I'll budget for

1 an election. We have elections every other year,  
2 but I always budget for one just in case we call a  
3 special election or somebody resigns or what have  
4 you. I always budget every year, even though we  
5 have elections every other year.

6 Q Okay. And so in that process, you would  
7 propose a budget for, say, elections, along with  
8 the other activities that your office does, and go  
9 to the city council -- or I guess it's called the  
10 city commission -- and present that to the city  
11 commission for approval; is that correct?

12 A No. I mean, I budget for it, but the --  
13 we have a city commission liaison that does that  
14 budget, so she comes to me and she asks, you know,  
15 "Should we budget?" And, of course, every year I  
16 tell her, "Yes, just go ahead and plan for -- you  
17 know, for an election just in case, that way, you  
18 know, the funds are there." But I don't -- don't  
19 go for approval. That would be our city  
20 commission liaison, and she handles that line  
21 item.

22 Q Okay. And so your involvement in that  
23 process would be just to explain to that liaison  
24 person how much you think that line item should  
25 be?

1 A Correct.

2 Q And in doing so, would you have to break  
3 that out by, you know, individual staff, you know,  
4 paying election workers, things like that, or is  
5 it just one flat line item for the whole election?

6 A It's just one flat item. We've got one  
7 just for the election, and then we've got one just  
8 for payroll and overtime.

9 Q Okay. And what -- is that -- is the  
10 amount proposed for that the same every year?

11 A It varies. If I know I'm having an  
12 election --

13 Q And --

14 A If I know I'm having an election and it's,  
15 you know -- if it includes the mayoral, it's going  
16 to be different because by -- we run by district,  
17 and so I know I'm going to be having all the  
18 polling places open, 1 through 6, because it's a  
19 position at large, versus when I know it's just  
20 the commissioners running, it's going to be only  
21 that single-member district. So on a mayoral,  
22 state commission year, it's going to be more than  
23 when it's just that single-member district -- 1  
24 and 2, 3, you know, versus when it's at large.

25 Q Understood.

1       A       Yes.

2       Q       And so what do you understand the duties  
3 of an early voting clerk to be, according to the  
4 election code?

5               MR. TAWIL:  Objection --

6 BY MR. COX:

7       Q       And I know you're not an attorney, so I  
8 don't expect you to be, like, very technical about  
9 this.  But just generally, what are -- what is  
10 your understanding of the early voting clerk's  
11 responsibilities?

12              MR. TAWIL:  Objection; form.

13              Perla, you can answer that question  
14 if you know.

15              THE WITNESS:  Yes.  It's just  
16 basically the administration of the  
17 election, running the election to form,  
18 and providing the information to the  
19 judges and the alternate judges, and just  
20 making sure that we run a fair election.

21 BY MR. COX:

22       Q       Okay.  Anything else?

23       A       That's it.

24       Q       And if you had a question about what your  
25 obligations under the election code were, who



1 Q Okay. No problem there.

2 The -- I'd like you to scroll down to  
3 Page 31.

4 A Okay. Guadalupe.

5 Q And this is really just a random rejection  
6 notice I picked out, on Page 31.

7 This is just the standard notice of  
8 rejected ballot that you or -- that McAllen sends  
9 to someone if their ballot is rejected for any  
10 reason; is that right?

11 A Uh-huh. Correct.

12 Q And this one -- and this one in particular  
13 has checked Box Number 2, which says: "It was  
14 determined that the signature on the application  
15 for ballot by mail and carrier envelope was not  
16 signed by the same person."

17 Is that right?

18 A Correct.

19 Q And the signature at the bottom, do you  
20 recognize whose signature that is?

21 A I think that's Dan's. It could be Dan  
22 Codina.

23 Q Early voting ballot board judge in 2018?

24 A Yeah.

25 Q If you know. If you don't, that's okay.

1 A No. Okay.

2 Q So once the -- this form is filled out by  
3 the early voting ballot board judge; is that  
4 right?

5 A Correct, yes.

6 Q Okay. And so once it's filled out by that  
7 person, what happens to this form from there?

8 A We mail out the original and keep a copy  
9 for our records.

10 Q Okay. And so who mails out the original?  
11 I mean, who -- yeah, who emails out the original?

12 A He puts everything in the envelopes. Of  
13 course, we make copies and return the originals.  
14 He puts everything in the envelopes, seal them,  
15 and then we take them downstairs. And we have a  
16 carrier that picks up the information, the mail,  
17 in the mornings and in the afternoons.

18 Q Okay. And if those were, say, returned to  
19 sender, they would come back to your office?

20 A Yes.

21 Q Okay. Now, I want you to scroll up four  
22 pages to Page 27. This looks to me like another  
23 notice of rejected ballot.

24 Let me know if you're there.

25 A Okay.

RICHARDSON: PERLA LARA

Page 146

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

DR. GEORGE RICHARDSON;  
ROSALIE WEISFELD; AUSTIN JUSTICE  
COALITION; COALITION OF TEXANS  
WITH DISABILITIES; MOVE TEXAS  
CIVIC FUND; LEAGUE OF WOMEN  
VOTERS OF TEXAS; and AMERICAN GI  
FORUM OF TEXAS, INC.,

Plaintiffs,

v.

TEXAS SECRETARY OF STATE; TRUDY  
HANCOCK, in her official  
capacity as BRAZOS COUNTY  
ELECTIONS ADMINISTRATOR; and  
PERLA LARA, in her official  
capacity as CITY OF McALLEN,  
TEXAS, SECRETARY,

Defendants.

Civil Case No.  
5:19-cv-00963-OLG

REPORTER'S CERTIFICATION  
REMOTE VIDEOTAPED DEPOSITION OF  
PERLA LARA  
May 14, 2020

I, Rebecca A. Graziano, Certified Shorthand  
Reporter in and for the State of Texas, hereby  
certify to the following:

That the witness, PERLA LARA, was duly sworn  
and that the transcript of the oral deposition is  
a true record of the testimony given by the  
witness;

I further certify that pursuant to FRCP Rule  
30(f)(1) that the signature of the deponent:

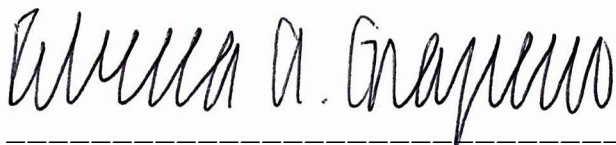
1              X   was requested by the deponent or a  
2            party before the completion of the deposition and  
3            returned within 30 days from date of receipt of  
4            the transcript. If returned, the attached Changes  
5            and Signature Page contains any changes and the  
6            reasons therefor.

7            \_\_\_\_\_ was not requested by the deponent or a  
8            party before the completion of the deposition.

9            I further certify that I am neither attorney  
10           nor counsel for, related to, nor employed by any  
11           of the parties to the action in which this  
12           testimony was taken.

13           Further, I am not a relative or employee of  
14           any attorney of record in this cause, nor do I  
15           have a financial interest in the action.

16           Subscribed and sworn to on this   28   day of  
17             MAY  , 2020.

18  
19  
20           

21           \_\_\_\_\_  
22           Rebecca A. Graziano, CSR, RPR, CRR  
23           Texas CSR No. 9306  
24           Expiration Date: 07/31/22  
25           DALLAS 69

# Exhibit 80

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

DR. GEORGE RICHARDSON; )  
ROSALIE WEISFELD; AUSTIN JUSTICE )  
COALITION; COALITION OF TEXANS )  
WITH DISABILITIES; MOVE TEXAS )  
CIVIC FUND; LEAGUE OF WOMEN )  
VOTERS OF TEXAS; and AMERICAN GI )  
FORUM OF TEXAS, INC., )

Plaintiffs, )

v. )

TEXAS SECRETARY OF STATE; TRUDY )  
HANCOCK, in her official )  
capacity as BRAZOS COUNTY )  
ELECTIONS ADMINISTRATOR; and )  
PERLA LARA, in her official )  
capacity as CITY OF McALLEN, )  
TEXAS, SECRETARY, )

Defendants. )

Civil Case No.  
5:19-cv-00963-OLG

**CERTIFIED  
TRANSCRIPT**

\*\*\*\*\*  
REMOTE VIDEOTAPED 30(b)(6) DEPOSITION OF  
PERLA LARA  
May 14, 2020  
\*\*\*\*\*

REMOTE VIDEOTAPED 30(b)(6) DEPOSITION OF

PERLA LARA, produced as a witness at the instance  
of the Plaintiffs, and duly sworn, was taken in  
the above-styled and numbered cause on  
May 14, 2020, from 1:41 p.m. to 3:15 p.m.,  
remotely before Rebecca A. Graziano, CSR, RPR,  
CRR, in and for the State of Texas, reported by  
machine shorthand, pursuant to the Federal Rules  
of Civil Procedure and the provisions stated on  
the record.

A P P E A R A N C E S

REPRESENTING THE PLAINTIFFS:

Mr. Hani Mirza (via videoconference)  
Mr. Ryan Cox (via videoconference)  
Mr. Zachary D. Dolling (via videoconference)  
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1405 Montopolis Drive  
Austin, Texas 78741  
(512) 474-5073  
hani@texascivilrightsproject.org  
ryan@texascivilrightsproject.org  
zachary@texascivilrightsproject.org

and

Mr. Samuel Kalar (via videoconference)  
Ms. Joanna Suriani (via videoconference)  
WILLKIE FARR & GALLAGHER, LLP  
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jsuriani@willkie.com

REPRESENTING THE DEFENDANT, TEXAS SECRETARY OF  
STATE:

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anna.mackin@texasattorneygeneral.gov

REPRESENTING THE DEFENDANT, TRUDY HANCOCK, in her  
official capacity as BRAZOS COUNTY ELECTIONS  
ADMINISTRATOR:

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Austin, Texas 78701  
(512) 482-0701  
e.magee@allison-bass.com

A P P E A R A N C E S

REPRESENTING THE DEFENDANT, PERLA LARA, in her  
official capacity as CITY OF McALLEN, TEXAS,  
SECRETARY:

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Mr. Austin W. Stevenson (via videoconference)  
CITY OF McALLEN CITY ATTORNEY'S OFFICE  
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(956) 681-3111  
itawil@mcallen.net  
astevenson@mcallen.net

ALSO PRESENT:

Mr. Bruce Erratt (via videoconference)

VIDEOCONFERENCE TECHNICIAN:

Ms. Maygun Flanagan



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Exhibit 3	February 2020 Election Advisory Email; Bates SOS_000737 through 000741.....	46

PROCEEDINGS

(On the record at 1:41 p.m.)

THE VIDEOGRAPHER: We are going on the video record. Today is May 14th, 2020. The time is 1:41 p.m.

The civil action number is 5:19-cv-00963-OLG in the matter of Dr. George Richardson, et al., versus Texas Secretary of State. The deponent is City of McAllen, Texas, secretary, Perla Lara. The video deposition is requested by plaintiffs' counsel, Texas Civil Rights Project, Austin.

My name is Maygun Flanagan. I am the videographer. The court reporter today is Becky Graziano. We are both representing HG Litigation Services.

Will counsel please identify themselves for the record?

MR. COX: My name is Ryan Cox, C-o-x, with the Texas Civil Rights Project on behalf of the plaintiffs.

MR. MIRZA: My name is Hani Mirza with the Texas Civil Rights Project, also on behalf of the plaintiffs.

1 MR. KALAR: Also on behalf of  
2 plaintiffs, my name is Samuel Kalar of the  
3 law firm Willkie Farr & Gallagher.

4 MS. SURIANI: And also on behalf of  
5 plaintiffs, my name is Joanna Suriani of  
6 the law firm Willkie Farr & Gallagher.

7 MR. STEVENSON: Austin Stevenson on  
8 behalf of defendant Perla Lara in her  
9 official capacity, McAllen city secretary.

10 MR. TAWIL: And Isaac Tawil on  
11 behalf of Ms. Lara as well.

12 MR. MAGEE: This is Eric Magee on  
13 behalf of Trudy Hancock, the Brazos County  
14 elections administrator, in her official  
15 capacity.

16 MS. MACKIN: This is Anna Mackin  
17 with the Texas Attorney General's office  
18 on behalf of the Secretary of State in her  
19 official capacity.

20 (Witness duly sworn.)

21 PERLA LARA,  
22 being first duly sworn, testified as follows:

23 EXAMINATION

24 BY MR. COX:

25 Q Thank you, Ms. Lara. I appreciate being

1 individual trainings, and we're here to give them  
2 guidance and answer any questions and point them  
3 out to all the resources that our SOS makes  
4 available to us on the internet. We let them know  
5 of all the advisories. They -- they're -- they  
6 equip us with a lot of advisories for every year,  
7 and that's where we refer them to, to all those  
8 sources.

9 Q Okay. And when you're saying "they,"  
10 you're talking about early voting ballot board  
11 members or SVC committee members?

12 A Right, our board members, our -- right,  
13 our judge and alternate judge and our -- our  
14 clerks.

15 Q Great.

16 And one thing that I was thinking  
17 about at lunch, where -- where does the early  
18 voting ballot board or election -- or EVC actually  
19 physically meet?

20 A Here at city hall.

21 Q Okay. Is that in your offices in  
22 election -- or in the city secretary's office?

23 A No. We designate a conference room for  
24 them.

25 Q Okay. And what is -- it's just a random

1 conference room somewhere at city hall? Or it's  
2 always the same one?

3 A It's -- most of the time, it's the same  
4 one. I think there was one year that it was a  
5 different one that we used. Because we've got  
6 several. But for the most part, it's the -- it's  
7 one on the second floor.

8 Q Okay. And so they -- so they -- when they  
9 arrive to convene the early voting ballot board,  
10 do they -- they come to your office first to pick  
11 up the ballots, or you hand deliver the ballots to  
12 that room that they're already working in?

13 A Right. No, they -- they report to us to  
14 pick up their supplies, materials, and take their  
15 oath of office. And then after that, I've got  
16 staff that will go unlock the cabinets and get the  
17 ballots and give that information to them, and  
18 then we walk them over to the conference room.

19 Q So those ballots and information are kind  
20 of handed to the judge, the --

21 A At that point.

22 Q -- the judge of the EVBB at that time?

23 A Yes.

24 Q Okay. And can you please describe what  
25 the duties of an EVB- -- EVBB member are?

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

DR. GEORGE RICHARDSON; )  
ROSALIE WEISFELD; AUSTIN JUSTICE )  
COALITION; COALITION OF TEXANS )  
WITH DISABILITIES; MOVE TEXAS )  
CIVIC FUND; LEAGUE OF WOMEN )  
VOTERS OF TEXAS; and AMERICAN GI )  
FORUM OF TEXAS, INC., )  
)  
Plaintiffs, )  
v. ) Civil Case No.  
) 5:19-cv-00963-OLG  
TEXAS SECRETARY OF STATE; TRUDY )  
HANCOCK, in her official )  
capacity as BRAZOS COUNTY )  
ELECTIONS ADMINISTRATOR; and )  
PERLA LARA, in her official )  
capacity as CITY OF McALLEN, )  
TEXAS, SECRETARY, )  
)  
Defendants. )

REPORTER'S CERTIFICATION  
REMOTE VIDEOTAPED DEPOSITION OF  
PERLA LARA  
May 14, 2020

I, Rebecca A. Graziano, Certified Shorthand  
Reporter in and for the State of Texas, hereby  
certify to the following:

That the witness, PERLA LARA, was duly sworn  
and that the transcript of the oral deposition is  
a true record of the testimony given by the  
witness;

I further certify that pursuant to FRCP Rule  
30(f)(1) that the signature of the deponent:

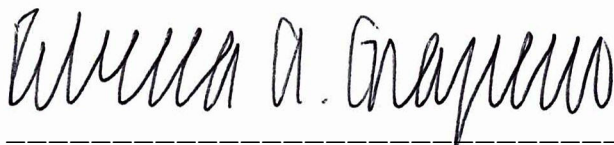
1              X   was requested by the deponent or a  
2            party before the completion of the deposition and  
3            returned within 30 days from date of receipt of  
4            the transcript. If returned, the attached Changes  
5            and Signature Page contains any changes and the  
6            reasons therefor.

7            \_\_\_\_\_ was not requested by the deponent or a  
8            party before the completion of the deposition.

9            I further certify that I am neither attorney  
10           nor counsel for, related to, nor employed by any  
11           of the parties to the action in which this  
12           testimony was taken.

13           Further, I am not a relative or employee of  
14           any attorney of record in this cause, nor do I  
15           have a financial interest in the action.

16           Subscribed and sworn to on this   28   day of  
17           MAY\_\_\_\_\_, 2020.

18  
19  
20           

21           \_\_\_\_\_  
22           Rebecca A. Graziano, CSR, RPR, CRR  
23           Texas CSR No. 9306  
24           Expiration Date: 07/31/22  
25           DALLAS 69

# Exhibit 81



IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

DR. GEORGE RICHARDSON,	)	
ROSALIE WEISFELD, AUSTIN	)	
JUSTICE COALITION,	)	
COALITION OF TEXANS WITH	)	
DISABILITIES, MOVE TEXAS	)	
CIVIC FUND, LEAGUE OF	)	
WOMEN VOTERS OF TEXAS, and	)	
AMERICAN GI FORUM OF	)	
TEXAS, INC.,	)	
Plaintiffs,	)	
	)	
vs.	)	CASE NO. 5:19-cv-00963
	)	
TEXAS SECRETARY OF STATE,	)	
TRUDY HANCOCK, IN HER	)	
OFFICIAL CAPACITY AS	)	
BRAZOS COUNTY ELECTIONS	)	
ADMINISTRATOR, AND PERLA	)	
LARA IN HER OFFICIAL	)	
CAPACITY AS CITY OF	)	
MCALLEN, TEXAS SECRETARY,	)	
Defendants.	)	

ORAL AND VIDEO DEPOSITION

DR. GEORGE RICHARDSON

MAY 13, 2020

(REPORTED REMOTELY)

1 ORAL AND VIDEO DEPOSITION OF DR. GEORGE RICHARDSON,  
2 produced as a witness at the instance of Defendant Texas  
3 Secretary of State and duly sworn, was taken in the  
4 above-styled and numbered cause on the 13th day of May,  
5 2020, from 9:59 a.m. to 11:32 a.m., before Dana  
6 Richardson, Certified Shorthand Reporter in and for the  
7 State of Texas, reported remotely by computerized  
8 stenotype machine, the witness located at the residence  
9 of Dr. George Richardson, 4070 Sweetwater Drive, College  
10 Station, Texas 77845, pursuant to the Federal Rules of  
11 Civil Procedure and the provisions stated on the record  
12 or attached hereto.

13

14

15

16

17

18

19

20

21

22

23

24

25

## APPEARANCES

## FOR PLAINTIFFS:

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- and -

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- and -

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- and -

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## APPEARANCES - (CONT'D)

FOR DEFENDANT PERLA LARA IN HER OFFICIAL CAPACITY AS  
CITY OF MCALLEN, TEXAS SECRETARY:

Mr. Isaac J. Tawil - (via webconference)

- and -

Mr. Austin Stevenson - (via webconference)

CITY OF MCALLEN

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McAllen, Texas 78501-5002

Telephone: (956) 681-1090

E-mail: itawil@mcallen.net; astevenson@mcallen.net

FOR DEFENDANT TRUDY HANCOCK IN HER OFFICIAL CAPACITY AS  
BRAZOS COUNTY ELECTIONS ADMINISTRATOR:

Mr. J. Eric Magee - (via webconference)

ALLISON, BASS & MAGEE, LLP

402 West 12th Street

Austin, Texas 78701

Telephone: (512) 482-0701

Fax: (512) 480-0902

E-mail: e.magee@allison-bass.com

## ALSO PRESENT:

Mr. Bruce Erratt, Brazos County - (via web)

Ms. Trudy Hancock - (via web)

Ms. Amelia Christopher, Video Technician - (via web)

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DR. GEORGE RICHARDSON

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## EXHIBITS

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Exhibit 6	"Opinions" page from The Eagle, November 19, 2018	36
Exhibit 7	Statement of Compensation and Oaths	38
Exhibit 8	Plaintiff Dr. George Richardson's Objections and Responses to Defendant Secretary of State's First Requests For Admission, Interrogatories, and Requests For Production	40

1 THE REPORTER: We're on the record.  
2 Today's date is May 13, 2020. The time is 9:59 a.m.  
3 This is the deposition of Dr. George Richardson taken in  
4 the matter of Dr. George Richardson, Rosalie Weisfeld,  
5 Austin Justin (sic) Coalition, Coalition of Texans With  
6 Disabilities, Move Texas Civic Fund, League of Women  
7 Voters of Texas and American GI Forum of Texas, Inc.,  
8 Plaintiffs, v. Texas Secretary of State, Trudy Hancock,  
9 In Her Official Capacity as Brazos County Elections  
10 Administrator, and Perla Lara In her Official Capacity  
11 as City of McAllen, Texas Secretary, Defendants. This  
12 is pending in the United States District Court for the  
13 Western District of Texas, San Antonio Division in Civil  
14 Action No. 5:19-cv-00963, and it is being conducted by  
15 the Federal Rules and agreement of the parties to the  
16 remote swearing of the witness.

17 The witness is -- is located at  
18 4070 Sweetwater Drive, College Station, Texas 77845.

19 My name is Dana Richardson, Texas  
20 Certified Shorthand Reporter No. 5386. I'm  
21 administering the oath and reporting the deposition  
22 remotely by stenographic means from my residence within  
23 the state of Texas. My business address is care of  
24 Integrity Legal Solutions, P.O. Box 245, Manchaca, Texas  
25 78652.

1 Dr. Richardson, please raise your right  
2 hand to be sworn.

3 (Witness sworn)

4 THE REPORTER: Would counsel please state  
5 your -- state your appearance and location for the  
6 record, beginning with Plaintiff counsel.

7 MR. MIRZA: My name is Hani Mirza with the  
8 Texas Civil Rights Project. I am representing  
9 plaintiffs in this case; and I am located in Dallas,  
10 Texas.

11 THE REPORTER: Ms. Mackin --

12 MR. KALAR: I'm Samuel Kalar -- I'm Samuel  
13 Kalar, also with the plaintiffs in this case, with the  
14 law firm Willkie, Farr & Gallagher; and I'm located in  
15 New York, New York.

16 THE REPORTER: Thank you.

17 MS. SURIANI: I'm JoAnna Suriani of the  
18 law firm Willkie, Farr & Gallagher, also on behalf of  
19 Plaintiffs. I'm located in Washington, DC.

20 MS. MACKIN: This is Anna Mackin with the  
21 Texas Attorney General's Office. I represent the  
22 Defendant Texas Secretary of State in her official  
23 capacity; and I am located in Austin, Texas.

24 MR. TAWIL: My name is Isaac Tawil. I  
25 represent Perla Lara in her official capacity as

1           **Q.     (BY MS. MACKIN) It's okay if you don't know.**

2           A.     I'm not sure. I mean, I -- I assumed it was  
3 the patient that signed -- tried to sign my name, but  
4 I -- I don't see how that would have -- I don't know  
5 what tipped them off, to tell you the truth.

6           **Q.     Are you aware of any other circumstances in**  
7 **which a prescription has been rejected because of the**  
8 **signature on it?**

9           A.     No. I mean, I can't recall any. It doesn't  
10 mean it didn't happen, but...

11                   MS. MACKIN: All right, Dr. Richardson, I  
12 don't have any other questions for you; and I appreciate  
13 your time. And I'll pass the witness.

14                   MR. MIRZA: I have a few questions,  
15 Dr. Richardson.

16                                   EXAMINATION

17           **Q.     (BY MR. MIRZA) You were not asked to serve on**  
18 **the board of the Coalition of Texans With Disabilities**  
19 **specifically, correct?**

20           A.     That's correct.

21           **Q.     Okay. Do you know who will review your**  
22 **signatures the next time you submit a mail-in ballot and**  
23 **the times afterwards when you submit a mail-in ballot?**

24           A.     No.

25           **Q.     Do you know if the individuals who review your**



1 future mail-in ballots will know who you are?

2 A. No.

3 Q. Okay. Do you know, then, whether those  
4 individuals will reject your mail-in ballot for a  
5 signature mismatch in the future?

6 A. No.

7 MR. MIRZA: Thank you. Pass the witness.

8 MS. MACKIN: Anything further?

9 MR. MAGEE: Yeah. This is Eric Magee.

10 Can we have about a 10-minute break for me to go through  
11 my notes? And then I can probably make it really short.

12 THE REPORTER: Okay. We're off the record  
13 at 11:06 a.m.

14 (Recess taken)

15 THE REPORTER: We're back on the record at  
16 11:20 a.m.

17 EXAMINATION

18 Q. (BY MR. MAGEE) Dr. Richardson, my name is Eric  
19 Magee; and I represent Brazos County, Trudy Hancock, the  
20 elections administrator, in her official capacity. Do  
21 you understand that?

22 A. Yes.

23 Q. I just want to follow up on a few things  
24 Ms. Mackin asked you about to make sure I had a full  
25 understanding. Earlier in the deposition, she asked you

1 STATE OF TEXAS  
2 COUNTY OF MONTGOMERY

3 REPORTER'S CERTIFICATE

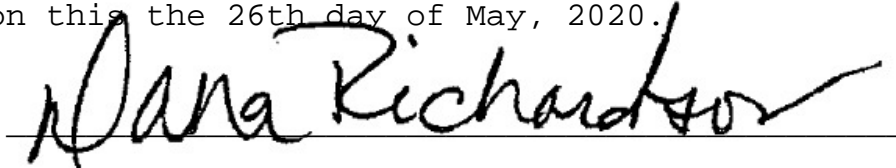
4 I, Dana Richardson, a Certified Shorthand Reporter  
5 in and for the State of Texas, do certify that this  
6 deposition transcript is a true record of the testimony  
7 given by the witness named herein, after said witness  
8 was duly sworn by me. The witness was requested to  
9 review the deposition.

10 I further certify that I am neither attorney or  
11 counsel for, related to, nor employed by any parties to  
12 the action in which this testimony is taken and,  
13 further, that I am not a relative or employee of any  
14 counsel employed by the parties hereto or financially  
15 interested in the action.

16 I further certify that the amount of time used by  
17 each party at the deposition is as follows:

18 Ms. Anne Marie Mackin - 01:03  
19 Mr. Hani Mirza - 00:01  
20 Mr. Eric Magee - 00:11  
21 Mr. Isaac J. Tawil - 00:01

22 SUBSCRIBED AND SWORN TO under my hand and seal of  
23 office on this the 26th day of May, 2020.

24 

25 Dana Richardson, RPR, TX CSR 5386  
Expiration: 01/31/22  
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